

FINAL ENVIRONMENTAL IMPACT REPORT

FOR THE

**CITY OF LA QUINTA GENERAL PLAN,
ANNEXATION NO. 12
AND
SPHERE OF INFLUENCE AMENDMENT
(SCH NO.: 2000091023)**

Prepared for:

**City of La Quinta
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**FINAL EIR
RESPONSE TO COMMENTS
ON
DRAFT ENVIRONMENTAL IMPACT REPORT
FOR THE
CITY OF LA QUINTA COMPREHENSIVE GENERAL PLAN,
ANNEXATION NO. 12 AND SPHERE OF INFLUENCE AMENDMENT**

FEBRUARY 14, 2002

**CITY OF LA QUINTA
RIVERSIDE COUNTY, CALIFORNIA
STATE CLEARINGHOUSE No. 2000091023**

AGENCY COMMENTS/RESPONSE TO COMMENTS

The Response to Comments on the Draft EIR for the La Quinta Comprehensive General Plan has been prepared in accordance with Section 15088, 15089 and 15132 of the California Environmental Quality Act (CEQA) Guidelines. The following agencies and interested parties have commented on the Draft EIR.

Please note that Section I contains agency comments and subsequent responses. Section II contains the full text of commenting agency correspondence.

SECTION I:

The following comments were received on the Draft EIR transmitted to various public agencies and interested parties. These comments concern aspects of the DEIR, including clarification of information, limits of Comprehensive General Plan applicability, and similar issues. The following responses have been prepared to address issues raised in the agency/interested party comments.

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SECTION II: All letters included in Section I, above, are provided in their original form, in the following order:

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A.	Coachella Valley Water District
B.	Coachella Valley Mosquito And Vector Control District
C.	Sunline Services Group
D.	Riverside County Sheriff's Department
E.	Southern California Gas Company
F.	Southern California Association Of Governments
G.	The Vista Santa Rosa Association
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A. COACHELLA VALLEY WATER DISTRICT

A.1. Comment: This is in response to your transmittal and request for comments for the above-referenced document dated July 13. We appreciate the opportunity to respond to this document. The proposed annexation and sphere of influence amendments are within our service area. Future development within the subject area will most likely affect all five types of facilities: domestic water, sanitation, stormwater, irrigation supply and agricultural drainage.

We encourage the city's continuing cooperation in the Coachella Valley Water Management Plan as a means of securing adequate water supplies for the future. Our comments can be found in Attachment A, enclosed.

Response: Comment noted.

A.2. Comment: Page I-27, Water Resources, second paragraph, fourth sentence, please revise to reflect the following:

The district estimates that 40 percent of the domestic water used in the upper valley is reintroduced into the groundwater table through percolation.

In the lower valley (areas south and east of Point Happy) this number ranges between 50 percent and 25 percent depending on the subterranean soil characteristics in the vicinity of a project.

Response: Comment noted. The sentence is hereby revised as follows:

"CVWD estimates that 40 percent of the domestic water consumed in the upper Coachella Valley (areas west and north of Point Happy) is reintroduced into the groundwater table through percolation. In the lower valley (areas south and east of Point Happy), this number ranges between 25 percent and 50 percent, depending on site-specific subterranean soil characteristics."

A.3. Comment: Page II-7, Water Quality/Resources, under the subheading of Whitewater River Subbasin, third paragraph:

This sentence is incorrect. The increased water levels after 1951 was the result of decreased use of groundwater after Colorado River water became available for farm irrigation. After Colorado River water became the primary source of agriculture water and groundwater levels

began to rise until the 1970's when well water was used for drip irrigation.

Response: Comment noted. The paragraph is hereby revised as follows:

“Historic data indicate that water levels in the Whitewater River Subbasin declined steadily during the first half of the twentieth century. After Colorado River water became available for farm irrigation around 1951, the demand for groundwater for irrigation purposes decreased, and water levels in the Whitewater River Subbasin began to rise. Water levels rose until the 1970s, when well water began to be used for drip irrigation. However, according to CVWD’s Engineer’s Report on Water Supply and Replenishment Assessment (April 2000), water levels in the lower Coachella Valley (south and east of Point Happy) have again declined, partly as a result of increased urbanization and groundwater usage.”

A.4. Comment: Page III-75, Soils and Geology, under the subheading Mitigation Measures, Item A:

This section is incorrect in suggesting that Lake Cahuilla may fall under the jurisdiction of the California Division of Safety of Dams. As a federally owned facility, Lake Cahuilla is not under the jurisdiction of the State Division of Dams. Lake Cahuilla is operated and maintained by CVWD and it is the district’s responsibility to maintain the structural safety of the lake.

Response: Comment noted. Mitigation Measure A is hereby revised as follows:

“The City shall coordinate with the Coachella Valley Water District to assure that the structural integrity of Lake Cahuilla and its levee system is maintained to resist seismic damage and potential inundation of adjacent lands.”

In addition, page III-74, first paragraph, last sentence is hereby revised as follows:

“The Coachella Valley Water District is responsible for operating and maintaining Lake Cahuilla and its levee system, and the City shall coordinate with CVWD to assure that its structural integrity is maintained.”

Also, page III-80, last paragraph, the last two sentences, which refer to the California Division of Safety of Dams, are hereby deleted.

Also, page III-86, Mitigation Measure B is hereby revised as follows:

“The City Engineer shall routinely consult and coordinate with the Coachella Valley Water District to assure that the structural integrity of Lake Cahuilla and its levee system is maintained.”

A.5. Comment: Page III-81, Flood Hazard Areas should address the following:

Much of the area within the proposed annexation and the proposed sphere of influence is currently identified as Zone D on the Federal Flood Insurance Rate Maps that are in effect at this time. A zone D represents areas that have undetermined flood risks. As the city annexes these areas, it becomes the local NFIP community with jurisdictional responsibilities. The city should participate with CVWD in funding flood risk studies for the subject area so that the proper flood risks can be mapped.

Response: Comment noted. The following paragraph is hereby added to the “Flood Hazard Areas” discussion on pages III-81 and III-83:

“Much of the land in the southeasterly planning area, within the proposed annexation and sphere-of-influence, is currently identified as Zone D on the FIRM maps currently in effect. Zone D represents areas in which potential flooding hazards have not been determined. Should the City annex these lands in the future, it should coordinate with CVWD in the preparation of flood risk studies for these areas so that flood risks can be mapped and evaluated.”

In addition, the following Mitigation Measure is hereby added to page III-86:

“Should the City annex any lands in the southeasterly portion of the planning area, which are designated as Zone D on FIRM maps, it shall coordinate with CVWD regarding the preparation and funding of flood hazard studies and mapping.”

A.6. Comment: Page III-86, Hydrology, under the subheading Mitigation Measures, Item C:

This paragraph refers to the seismic safety of CVWD’s above ground reservoirs. The water tanks currently meet seismic requirements and are not in need of seismic retrofitting. District reservoirs are fitted with seismic couplings to absorb seismic forces. The reservoirs are also fitted with automatically actuated seismic valves that will shut off within 45 seconds of seismic activity.

Response: Comment noted. Mitigation Measure C is hereby revised as follows:

“The City shall coordinate with the Coachella Valley Water District to assure that all future above-ground reservoirs are designed and constructed in compliance with seismic safety requirements.”

Also, on page III-74, first paragraph, the following sentences are hereby added:

“Above-ground reservoirs in the planning area are owned and operated by the Coachella Valley Water District and currently meet seismic safety requirements. They are outfitted with seismic couplings, which absorb seismic forces, and automatically actuated seismic valves that shut off within 45 seconds of a seismic event.”

A.7. Comment: Page III-87, Water Resources/Quality:

This section should refer to the Coachella Valley Draft Water Management Plan, prepared by CVWD, which discusses existing conditions and mitigation goals for the general plan planning area. The mitigation measures beginning on page III-94, should indicate the city’s support for implementing the goals of the water management plan including source substitution, conservation and groundwater recharge.

Response: Comment noted. The EIR text is hereby amended to incorporate the following paragraph:

“The Coachella Valley Draft Water Management Plan, prepared by the Coachella Valley Water District in November 2000, describes existing and historical water conditions in the Coachella Valley and outlines the District’s means of meeting water demands through 2035. The Plan evaluates several alternatives for meeting future water needs and recommends a preferred alternative, which incorporates a combination of water conservation, source substitution, groundwater recharge, additional water supplies, and ongoing groundwater monitoring programs. The Plan sets goals for improving all components of regional water management, including urban, golf course, overdraft, groundwater replenishment, water quality, and agricultural water, and establishes benchmarks by which progress can be measured. Implementation of the Plan will require the participation and cooperation of local residents and public and quasi-public agencies serving the Valley. The City of La Quinta supports the goals established by the Plan and will cooperate in their implementation.”

Also, the following mitigation measure is hereby added:

“The City shall cooperate in the implementation of the regional water management goals established by the Coachella Valley Draft Water Management Plan, including recharge, conservation, and source substitution programs.”

A.8. Comment: Page III-89, Domestic Water Services third sentence:

This sentence identifies the Myoma Dunes Mutual Water Company as the domestic water purveyor for all of the Bermuda Dunes area. This is not correct in that the district has several domestic water customers in Bermuda Dunes. Some of CVWD’s customers are located east of Adams Street also on the north and south side of Darby Road and areas along and adjacent to the east side of Washington Street. The jurisdictional boundaries between different water agencies will be confirmed during the city’s planning review process for new developments.

Response: Comment noted. The last sentence of the first paragraph under the subheading, Domestic Water Resources, is hereby deleted. The following is inserted in its place.

“CVWD also serves several customers in Bermuda Dunes at the following locations: east of Adams Street, along Darby Road, and along and adjacent to the east side of Washington Street. The remainder of Bermuda Dunes is located within the service area of the Myoma Dunes Mutual Water Company.

A.9. Comment: Page III-183, Domestic Water Service under the subheading Coachella Valley Water District we recommend the following revisions:

First paragraph, second sentence we recommend the word limited be deleted. The district serves many square miles of land south of Avenue 58.

First paragraph, third sentence we recommend that the part “A new well is proposed...” be changed to “A new well has been constructed.”

First paragraph, fourth sentence we recommend that the part “The existing wells have been drilled to depth ranging from 700 to 800 feet...” be changed to “The existing wells have been drilled to a depth ranging from 700 to 1000 feet...”

First paragraph, sixth sentence we recommend to be deleted completely.

Second paragraph, third sentence should be revised to affirm that Reservoir No. 6725 has been constructed with a capacity of 10 million gallons.

Second paragraph, fourth sentence should be revised to state the district's plans to construct an additional 5- to 10-million gallon reservoir near the southeastern edge of the La Quinta cove.

Response: Comments noted. The two paragraphs have been revised as follows:

“The Coachella Valley Water District (CVWD) is responsible for providing potable water to the majority of the planning area. Its service area generally extends from Washington Street near Interstate-10 in the north, to Avenue 56 to the south, as well as areas south of Avenue 58. CVWD has eleven active wells within the planning area. In addition, a new well was recently constructed at the northeast corner of Airport Boulevard and Madison Street. The existing wells have been drilled to depths ranging from 700 to 1,000 feet below the surface. Two inactive wells exist in the planning area within the PGA West development at the southwest corner of 54th Avenue and Madison Street.

Domestic water is conveyed through water mains up to 36 inches in diameter. CVWD's water distribution system includes five booster stations located in the southern portion of the planning area. CVWD also has eight reservoirs with storage capacities ranging from 250,000 gallons to 10 million gallons. Reservoir No. 6725, which has a capacity of 10 million gallons, was recently constructed in Lake Cahuilla County Park. CVWD plans to construct an additional 5- to 10-million gallon reservoir near the southeastern edge of the La Quinta cove.”

A.10. Comment: Page V-20, Water Resources first paragraph, second sentence refers to the current overdraft condition of about 0.24 percent per year. We recommend the report stay consistent with section III-88 and use 0.32 percent for the year 1999.

Response: Comment noted. The sentence is hereby revised to read:

“As discussed in Section III of this document, the subbasin is currently is an overdraft condition of about 0.32% per year.”

B. COACHELLA VALLEY MOSQUITO AND VECTOR CONTROL DISTRICT

B.1. Comment: In regard to the proposed project, one of the District's concerns is in the possibility of creating breeding sources for mosquitoes and aquatic midges by constructing flooding retention basins and drainage systems. The newly established drainage systems, although generally limited in size and location by the plan, could support breeding sources for vector species of mosquitoes, if not properly designed and constructed. It is a fact that one of the indigenous mosquito species, *Culex quinquefasciatus*, is a major vector for St. Louis encephalitis and western equine encephalomyelitis in the Coachella Valley.

Response: Comment noted.

B.2. Comment: The District would like to take this opportunity to bring to your attention the necessity of incorporating our District in the process of evaluating proposed architectural plans of drainage facilities and retention basins in order to insure that the public is protected from vectors and nuisance species that can be created by the proposed project.

Response: Comment noted. The following mitigation measure is hereby added to Section III-E, Hydrology:

“The City shall consult and confer with the Coachella Valley Mosquito and Vector Control District during the evaluation of plans for proposed drainage facilities and retention/detention basins, to assure that the public is adequately protected from vectors and nuisance species that may be generated by the project.”

SUNLINE SERVICES GROUP

C.1. Comment: Referencing section III page 36 under Public Transportation, changes to our service in July 2001 included the combination of routes 86 and 91 into one route which will be called the Line 91. The combination of these two routes will allow for better frequency for residents of the east end of the valley.

The Line 91 will operate eight round trips seven days a week.

Also, there were some additions to the Line 111. The Line 111 now operates 38 round trips on consistent 25 minute headways Monday through Friday and 23 round trips on weekends at 44 minute headways.

The Line 70 which operates within La Quinta is scheduled for service additions next July 2002. Our Planning and Operations Departments are currently working on this project.

Response: Comments noted. On page III-36, the following sentence is hereby added to the second paragraph:

“Line 70 is scheduled for service additions in July 2002.”

The following sentences are hereby added to the fourth paragraph:

“In July 2001, Line 86 and 91 were combined into a single route known as Line 91. This line currently operates eight round trips, seven days a week, and provides enhanced service to residents in the eastern Coachella Valley.

The following sentence replaces the second sentence of the fifth paragraph:

“Line 111 operates 38 round trips on consistent 25-minute headways, Monday through Friday, and 23 round trips on weekends at 44-minute headways.

D. RIVERSIDE COUNTY SHERIFF'S DEPARTMENT

D.1. Comment: The Sheriff's Department has the following comments to make regarding this plan.

Page II-15 (Police Protection) – The city currently contracts for 82 hours of patrol time per day. They also contract for a three-man special enforcement unit, a school resources officer, two community service officers, a motor officer, and a dedicated city sergeant.

Staffing levels and the law enforcement contract are reviewed annually.

Response: Comments noted. On page II-15, the fourth paragraph is hereby revised as follows:

"The Riverside County Sheriff's Department provides police protection to the City of La Quinta, its sphere-of-influence and the planning area. The sheriff's station is located on Doctor Carreon Boulevard in Indio. The City currently contracts for 82 hours of patrol time per day, a three-man special enforcement unit, a school resource officer, two community service officers, a motor officer, and a dedicated city sergeant. Staffing levels and the law enforcement contract are reviewed annually. Incidents and patrols within the unincorporated planning area are handled by County beat cars."

D.2. Comment: Page III-172 (Police Protection/Existing Conditions) – same as above

Response: Comments noted. The first paragraph on page III-172 is hereby amended as follows:

"The City of La Quinta contracts with the Riverside County Sheriff's Department for law enforcement services within the City limits. The sheriff station that serves the City is located at 82-695 Doctor Carreon Boulevard in Indio. A ratio of one police officer for every 1,000 residents is considered a desirable standard in many communities nationwide. The City currently contracts for 82 hours of patrol time per day, a three-man special enforcement unit, a school resource officer, two community service officers, a motor officer, and a dedicated city sergeant. The City's staffing levels and law enforcement contract are reviewed annually. Deputies currently have a five-minute response time throughout the City."

E. SOUTHERN CALIFORNIA GAS COMPANY

E.1. Comment: Thank you for the opportunity to respond to the above-referenced project. Please note that Southern California Gas Company has facilities in the area where the above named project is proposed. Gas service to the project could be provided without any significant impact on the environment. The service would be in accordance with the Company's policies and extension rules on file with the California Public Utilities Commission at the time contractual arrangements are made.

Response: Comment noted.

E.2. Comment: You should be aware that this letter is not to be interpreted as a contractual commitment to serve the proposed project, but only as an informational service. The availability of natural gas service, as set forth in this letter, is based upon present conditions of gas supply and regulatory policies. As a public utility, The Southern California Gas Company is under the jurisdiction of the California Public Utilities Commission. We can also be affected by actions of federal regulatory agencies. Should these agencies take any action, which affects gas supply, or the conditions under which service is available, gas service will be provided in accordance with revised conditions.

Response: Comment noted.

E.3. Comment: Typical demand use for:

- a. Residential (System Area Average/Use Per Meter)Yearly
Single Family 799 therms/year dwelling unit
Multi-Family 4 or less units 482 therms/year dwelling unit
Multi-Family 5 or more units 483 therms/year dwelling unit

These averages are based on total gas consumption in residential units served by Southern California Gas Company, and it should be not be implied that any particular home or tract of homes will use these amounts of energy.

- b. Commercial

Due to the fact that construction varies so widely (a glass building vs. a heavily insulated building) and there is such a wide variation in types of materials and equipment used, a typical demand figure is not available for this type of construction. Calculations would need to be made after the building has been designed.

Response: Comment noted.

E.4. Comment: We have Demand Side Management programs available to commercial/industrial customers to provide assistance in selecting the most effective applications of energy conservation techniques for a particular project.

Response: Comment noted.

F. SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

F.1. Comment: The Draft EIR does not address the relationship of the proposed project to **applicable regional plans** as required by Section 15125 [d] of *Guidelines for Implementation of the California Environmental Quality Act*.

The Final EIR should address the relationships (consistency with core policies and support of ancillary policies) to SCAG's Regional Comprehensive Plan and Guide, utilizing commentary from the following detailed SCAG staff comments. The response should also discuss any inconsistencies between the proposed project and applicable regional plans. We suggest that you identify the specific policies, by policy number, with a discussion of consistency of support with each policy.

Response: Comment noted. The responses below address each of the issue areas raised in SCAG's comment letter.

F.2. Comment: **The Growth Management Chapter (GMC)** of the Regional Comprehensive Plan and Guide contains a number of policies that are particularly applicable to the City of La Quinta Comprehensive General Plan Update.

Core Growth Management Policies

3.01 *The population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies, shall be used by SCAG in all phases of implementation and review.*

SCAG staff comments. The Draft EIR references the adopted RTP 1998 SCAG's Population, Household and Employment forecasts for the City of La Quinta. The Draft EIR should use growth forecasts from the adopted 2001 RTP, which were included in SCAG's May 23, 2001 letter on the Corrected NOP for the proposed Project. The estimates in the Draft EIR are slightly above the adopted RTP growth forecasts. The Project is partially consistent with this core RCPG policy.

Response: Comment noted. Table III-44 on page III-198 of the EIR, which identifies SCAG Growth Forecasts for the City is hereby revised as follows, to reflect the adopted 2001 RTP forecasts:

Table III-44
Growth Forecasts for the City of La Quinta
Years 2000-2020

Projection	2000	2005	2010	2015	2020
Population	21,194	24,452	30,369	36,189	44,084
Households	6,813	7,750	9,490	11,154	13,199
Employment	6,879	8,603	10,383	11,434	12,404

Source: Southern California Association of Governments, letter correspondence, May 23, 2001.

- F.3. Comment:** 3.03 *The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.*

SCAG staff comments. The Draft EIR does not present a discussion on Project phasing and timing. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive or detracts from the achievement of this policy. Based on the information provided in the Draft EIR, we are unable to determine if the Project is consistent with this core RCPG policy.

Response: The proposed Project is a Comprehensive General Plan with a planning area of approximately 53,498 acres. It is difficult to predict the timing, much less the location and type of financing of future public facilities, utility infrastructure, and transportation systems, as such information is entirely dependent upon the location and nature of future site-specific development proposals, which will be generated over the life of the General Plan. However, the City has implemented a Developer Impact Fee Program which provides for the funding of General Plan roadway improvements on a "fair share" basis. The future participation of individual projects in this program will ensure that transportation facilities are improved as needed to meet the SCAG Plan policy.

The General Plan includes a wide range of policies and programs that help assure that the community's growth and development will be orderly and timely. The City will coordinate closely with the Coachella Valley Water District and numerous other public and quasi-public agencies (described in Section III-L and throughout the EIR) in the implementation of public utility programs and infrastructure extensions. The City will continue to coordinate closely with the Coachella Valley Association of Governments (CVAG) in the implementation of the Transportation Uniform Mitigation Fee program, and Caltrans, the Sunline Transit Agency, Riverside County Airport Authority, and Union Pacific Railroad regarding the potential expansion and funding transportation systems in the planning area. Policies and programs are dispersed throughout the General Plan and EIR.

F.4. Comment: The Regional Transportation Plan (RTP) also has goals, objectives, policies and actions pertinent to this proposed project. This RTP links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. Among the relevant goals, objectives, policies and actions of the RTP are the following:

Core Regional Transportation Plan Policies

4.01 Transportation investments shall be based on SCAG's adopted Regional performance indicators.

SCAG staff comments. The Draft EIR does not provide a discussion on Transportation investments based on the following SCAG adopted Regional Performance indicators:

Mobility – *Transportation Systems should meet the public need for improved access, and for safe, comfortable, convenient, faster and economic movements of people and goods.*

- *Average Work Trip Travel Time in Minutes – 25 minutes (Auto)*
- *PM Peak Freeway Travel Speed – 45 minutes (Transit)*
- *PM Peak Non-Freeway Travel Speed*
- *Percent of PM Peak Travel in Delay (Fwy)*
- *Percent of PM Peak Travel in Delay (Non-Fwy)*

Accessibility – *Transportation system should ensure the ease with which opportunities are reached. Transportation and land use measures should be employed to ensure minimal time and cost.*

- *Work Opportunities within 45 Minutes door to door travel time (Mode Neutral)*
- *Average transit access time*

Environment – *Transportation system should sustain development and preservation of the existing system and the environment. (All trips)*

- *CO, ROG, NOx, PM10, PM2.5 – Meet the applicable SIP Emission Budget and the Transportation Conformity requirements*

Reliability – *Transportation system should have reasonable and dependable levels of service by mode. (All trips)*

- *Transit – 63%*
- *Highway – 76%*

Safety – Transportation systems should provide minimal accident, death and injury. (All Trips)

- *Fatalities Per Million Passenger Miles – 0*
- *Injury Accidents – 0*

Equity/Environmental Justice – The benefits of transportation investments should be equitably distributed among all ethnic, age and income groups. (All trips)

- *By Income Groups Share of Net Benefits – Equitable Distribution of Benefits among all Income Quintiles*

Cost-Effectiveness – Maximize return on transportation investment (All Trips). Air Quality, Mobility, Accessibility and Safety

- *Return on Total Investment – Optimize return on Transportation Investments*

The Final EIR should address the manner in which the Project is supportive of or detracts from the achievement of the eight core RTP objectives. Based on the information provided, we are unable to determine whether the Project is consistent with this core RCPG policy.

Response:

The La Quinta and Coachella Valley transportation systems currently meet the public need for improved access, and will continue to do so in the future. The General Plan supports and facilitates the safe, comfortable, convenient and economical movement of people and goods. As stated in the General Plan Traffic Study (included in the Appendix of the EIR), work trips originating in La Quinta are projected to be below the average 25-minute travel time target, and well above the PM peak freeway travel speed target of 45 mph. PM peak travel delays are projected to be limited to about 10%.

The General Plan Land Use Plan provides a good balance between employment and housing, and a wide range of work opportunities are available both within the planning area and surrounding communities. Nearly all employment opportunities in the Coachella Valley are within a 25-minute travel distance of La Quinta. Sunline Transit provides public transit service to major employment, residential, and commercial centers in the planning area and Coachella Valley.

The existing and planned City and regional transportation systems, as modeled in the 2020 CVATS model prepared by SCAG, are expected to sustain development and preserve the existing system and the environment. The region is a leader in the use of compressed natural gas for mass transit (Sunline Transit) and in local government vehicle fleets. The General Plan includes policies and programs that encourage

employers to utilize telecommuting and home-based employment opportunities, non-peak hour schedules, and multi-occupant modes of transportation to contribute to further reductions in emissions and traffic volumes. The Plan proposes a Golf Cart Route System and requires the City to prepare and adopt a comprehensive Trails Master Plan of continuous multi-use trails and bicycle routes, which will provide the community with additional environment-friendly travel alternatives. The City and region are expected to meet or better the emission budgets established by SCAG.

The General Plan EIR analyses a worst-case scenario with regard to future traffic volumes and associated impacts to local and regional roads. As shown in the traffic analysis in the Draft EIR and Technical Appendix F, with few exceptions, the City and regional transportation system is expected to continue to provide reasonable and dependable levels of service by all modes. Where exceptions may occur, a variety of mitigation measures, including roadway classification and cross-section upgrades, intersection improvements, and monitoring programs at critical intersections, will provide for acceptable and reliable levels of service.

The goals, policies, and programs of the Circulation Element and the mitigation measures set forth in the Draft EIR are designed to preserve roadway capacity and minimize the type of conditions most closely associated with unsafe transportation systems. The proposed Plan does not introduce any elements which are anticipated to result in unsafe travel conditions or hinder the City's ability to meet the injury, accident, and fatality standards set forth by SCAG.

Implementation of the CVATS transportation model and TUMF program are the first level of assurance that transportation costs are and will continue to be equitably distributed across all socio-economic sectors of the community. In addition, the City has implemented a Developer Impact Fee Program which provides for the funding of General Plan roadway improvements on a "fair share" basis. The future participation of individual projects in this program will ensure that transportation facilities are improved as needed. Sunline Transit offers an excellent valley-wide public transit system that provides access to all sectors of the population and accommodates special needs populations through its curb-to-curb SunDial service. The policies and programs found in the Circulation Element support and promote the equitable distribution of infrastructure investment and system availability.

F.5. Comment: *4.02 Transportation investments shall mitigate environmental impacts to an acceptable level.*

SCAG staff comments. The Draft EIR in Section 3-C (Traffic/Circulation) identifies transportation and circulation impacts, and details the measures to mitigate these impacts on page III-58. The Project is consistent with this core RCPG policy.

Response: Comment noted.

F.6. Comment: *4.04 Transportation Control Measures shall be a priority.*

SCAG staff comments. The Draft EIR, on page III-58, includes a discussion on the City's development and implementation of Transportation Demand Management strategies, to extend or preserve capacity roadways. In addition, mitigation measures support the implementation of Transportation Control Measures. The Project is consistent with this core RCPG policy.

Response: Comment noted.

F.7. Comment: *4.16 Maintaining and operating the existing transportation system will be a priority over expanding capacity.*

SCAG staff comments. The Draft EIR, in Section 3-C (Traffic/Circulation) includes a discussion on the existing circulation system, and recommends measures to upgrade the existing circulation system. This should maintain and operate the existing transportation system. The Project is consistent with this core RTP policy.

Response: Comment noted.

F.8. Comment: The Growth Management goals to develop urban forms that enable individuals to spend less income on housing cost, that minimize public and private development costs, and that enable firms to be competitive, strengthen the regional strategic goal to stimulate the regional economy. The evaluation of the proposed project in relation to the following policies would be intended to guide efforts toward achievement of such goals and does not infer regional interference with local land use powers.

3.05 Encourage patterns of urban development and land use, which reduce costs on infrastructure construction and make better use of existing facilities.

SCAG staff comments. The Draft EIR in Sections 3-C (Traffic/Circulation) and 3-L (Public Services and Facilities)

acknowledges that the Project will maximize the use of existing infrastructure and improve infrastructure deficiencies to meet the needs of the proposed Project. In addition, increases in demand for services will occur gradually as additional development takes place. Mitigation measures recommended in each section would address identified impacts. The Project is supportive of this ancillary RCPG policy.

Response: Comment noted.

F.9. Comment: *3.09 Support local jurisdictions' efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.*

SCAG staff comments. See SCAG comments on policy 3.05. The Project is supportive of the ancillary RCPG policy.

Response: Comment noted.

F.10. Comment: *3.10 Support local jurisdictions' actions to minimize red tape and expedite the permitting process to maintain economic vitality and competitiveness.*

SCAG staff comments. The Draft EIR only addresses subjects that may have adverse environmental impacts. It is written in a concise manner, where all possible adverse impacts are mitigated this will help minimize re tape, and help maintain the economic vitality and competitiveness of the City of La Quinta. In addition, the Draft EIR, on page I-30, includes a number of General Plan goals and policies, which will also help to minimize red tape, and help maintain the economic vitality and competitiveness of the City of La Quinta. The Project is supportive of this ancillary RCPG policy.

Response: Comment noted.

F.11. Comment: The Growth Management goals to attain mobility and clean air goals and to develop urban forms that enhance quality of life, that accommodate a diversity of life styles, that preserve open space and natural resources, and that are aesthetically pleasing and preserve the character of communities, enhance the regional strategic goal of maintaining the regional quality of life. The evaluation of the proposed project in relation to the following policies would be intended to provide direction for plan implementation, and does not allude to regional mandates.

3.12 Encourage existing or proposed local jurisdictions' programs aimed at designing land uses which encourage the use of transit and

thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled, and create opportunities for residents to walk and bike.

SCAG staff comments. The Draft EIR does not include a discussion on land uses that encourages the coordination and implementation of transit and transit facilities, and bikeways, pedestrian and/or equestrian trails. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive or detracts from the achievement of this policy. Based on the information provided in the Draft EIR, we are unable to determine if the Project is supportive of this ancillary RCPG policy.

Response: The Land Use Plan of the General Plan is designed to provide a balanced mix of housing and employment opportunities, which will contribute to reductions in the number of auto trips and vehicle miles traveled in the City and the Coachella Valley region. The EIR includes a comprehensive discussion and mapping of a proposed golf cart route system on pages III-44 through III-48, which is aimed at encouraging and accommodating this safe, economical, convenient, and non-polluting alternative mode of transportation. Furthermore, Mitigation Measure Items C, D, E, F, G, and N on pages III-58 and III-59 of the Draft EIR identify specific mechanisms that will encourage the continued use and future expansion of public transit, multi-use trails, bicycle routes, and flexible employment opportunities, all of which will reduce the need for roadway expansion and reduce the number of auto trips and vehicle miles traveled.

F.12. Comment: *3.13 Encourage local jurisdictions' plans that maximize the use of existing urbanized areas accessible to transit through infill and redevelopment.*

SCAG staff comments. The Draft EIR does not address the subject of transit service to serve and provide access to new development and redeveloped areas. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive or detracts from the achievement of this policy. Based on the information provided in the Draft EIR, we are unable to determine if the Project is supportive of this ancillary RCPG policy.

Response: Policy 6 on page I-31 of the Draft EIR, and Policy 6 of the General Plan Land Use Element, clearly state that the City shall promote in-fill development by prioritizing capital improvements in developed areas of the City. Furthermore, Mitigation Measure Item D on page III-58 requires that, prior to the approval of development proposals, the City

and developers confer with the Sunline Transit Agency to determine optimal locations for bus turnouts and covered bus shelters within the project and its vicinity. Implementation of this policy will assure that transit service is extended to all new development, to the satisfaction of the City and Sunline Transit Agency.

F.13. Comment: *3.17 Support and encourage settlement patterns, which contain a range of urban densities.*

SCAG staff comments. The Draft EIR in Section 3-A (Land Use Compatibility) identifies a range of urban densities. The Project is supportive of this ancillary RCPG policy.

Response: Comment noted.

F.14. Comment: *3.18 Encourage planned development in locations least likely to cause adverse environmental impact.*

SCAG staff comments. The Project is proposed in a manner, which will minimize adverse environmental impacts. Mitigation measures included in the Draft EIR have been developed to address identified impacts. The City of La Quinta should carefully consider the adequacy of these measures. The Project is supportive of this ancillary RCPG policy.

Response: Comment noted.

F.15. Comment: *3.20 Support the protection of vital resources such as wetlands, groundwater recharge areas, woodlands, production lands, and land containing unique and endangered plants and animals.*

SCAG staff comments. The Draft EIR in Section 3-G (Biological Resources) discusses the Projects' impact on biological resources. The Draft EIR recommends a number of mitigation measures to address impacts to plants, invertebrates and reptiles, birds and mammals. The Project is supportive of this ancillary RCPG policy.

Response: Comment noted.

F.16. Comment: *3.21 Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.*

SCAG staff comments. The Draft EIR in Section 3-H (Cultural Resources) identifies potential impacts related to archaeological and historic resources. A number of mitigation measures are recommended

to address impacts to archaeologic and historic resources. The Project is supportive of this ancillary RCPG policy.

Response: Comment noted.

F.17. Comment: *3.22 Discourage development, or encourage the use of special design requirements, in areas with steep slopes, high fire, flood, and seismic hazards.*

SCAG staff comment. The Draft EIR in Section 3-D (Soils and Geology) identifies potential impacts to soils, seismicity, induced slope instability, induced inundation and liquefaction. Mitigation measures recommended include the implementation of building codes, specific requirements and/or project design. The Project is supportive of this ancillary RCPG policy.

Response: Comment noted.

F.18. Comment: *3.23 Encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage, and to develop emergency response and recovery plans.*

SCAG staff comments. The Draft EIR in Section J-N (Noise) acknowledges potential noise impacts related to aviation, traffic, stationary noise sources and construction activities. Mitigation measures recommended in this Section have been developed to address identified impacts. The Project is supportive of this ancillary RCPG policy.

Response: Comment noted.

F.19. Comment: The Growth Management Goal to develop urban forms that avoid economic and social polarization promotes the regional strategic goal of minimizing social and geographic disparities and of reaching equity among all segments of society. The evaluation of the proposed project in relation to the policy stated below is intended guide direction for the accomplishment of this goal, and does not infer regional mandates and interference with local land use powers.

3.24 Encourage efforts of local jurisdictions in the implementation of programs that increase the supply and quality of housing and provide affordable housing as evaluated in the Regional Housing Needs Assessment.

SCAG staff comments. The Draft EIR, in Section 3-A (Land Use Compatibility) provides a discussion on residential land uses. The discussion suggests that there is the potential for 78,952 units at buildout, or an increase of 66,811 units over the long term. The Draft EIR, however, does not provide a discussion on programs that could increase the supply and quality of housing and the provision of affordable housing. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive or detracts from the achievement of this policy. Based on the information provided in the Draft EIR, the Project is partially supportive of this ancillary RCPG policy.

Response: The General Plan Housing Element is being prepared separately and will be processed immediately following the General Plan policy document. The Element will identify and describe specific programs that will increase the supply and quality of housing in the planning area, including affordable housing. Potential environmental impacts associated with future housing policies and programs will also be evaluated.

However, the General Plan and Draft EIR include a variety of implementation strategies directed at encouraging and maintaining high-quality residential development within the planning area. Policy 6 of the General Plan Land Use Element (Residential, p. 18) clearly states that the City will use development incentives to achieve a mix of housing, including affordable housing. Other policies and programs contained in the Land Use Element require that the Development Code include design standards which assure high quality development, and require the preparation of Specific Plans, under certain circumstances, to better define site-specific design parameters. Other design and performance standards address the use of building setbacks, height restrictions, pad elevations, infill development, and density transfers to assure that future development is compatible with the surrounding environment.

Mitigation Measures described in Section III-K, Visual Impacts, of the EIR require that new development complement the existing natural and built environments through the use of native landscaping materials, undergrounding of utilities wherever possible, restricting outdoor lighting and signage, preserving the quality of scenic viewsheds, and enhancing the character of neighborhoods and street corridors through urban and architectural design. The above-described policies and programs are intended to improve the development standards currently in place.

F.20. Comment: *3.27 Support local jurisdictions and other service providers in their efforts to develop sustainable communities and provide, equally to all members of society, accessible and effective services such as: public education, housing, health care, social services, recreational facilities, law enforcement, and fire protection.*

SCAG staff comments. The Draft EIR, in Section 3-L (Public Services and Facilities) acknowledges that the potential build out of the General Plan would have impacts on schools, libraries, police and fire protection, health care facilities and services. Mitigation measures are recommended to address impacts to services. The Project is supportive of this ancillary RCPG policy.

Response: Comment noted.

F.21. Comment: The Air Quality Chapter (AQC) core actions that are generally applicable to the Project are as follows:

5.07 Determine specific programs and associated actions needed (e.g., indirect source rules, enhanced use of telecommunications, provision of community based shuttle services, provision of demand management based programs, or vehicle-miles-traveled/emission fees) so that options to command and control regulations can be assessed.

SCAG staff comments. See SCAG staff comments for policy 4.02. The Draft EIR, in Section 3-I (Air Quality), includes a number of mitigation measures that encourages the implementation of measures that focuses on trip reduction, improving traffic flow, pedestrian movement, biking, public transit and utilizing alternative methods of transportation. The Project is consistent with this core RCPG policy.

Response: Comment noted.

F.22. Comment: *5.11 Through the environmental document review process, ensure that plans at all levels of government (regional, air basin, county, subregional and local) consider air quality, land use, transportation and economic relationships to ensure consistency and minimize conflicts.*

SCAG staff comments. The Draft EIR, in Section 3-I (Air Quality) discusses the consistency of the proposed Project with regional and local air quality policies and includes mitigation measures for impacts to air quality. The Project is consistent with this core RCPG policy.

Response: Comment noted.

F.23. Comment: The Water Quality Chapter core recommendations and policy options relate to the two water quality goals: to restore and maintain the chemical, physical and biological integrity of the nation's water; and, to achieve and maintain water quality objectives that are necessary to protect all beneficial uses of all waters.

11.07 Encourage water reclamation throughout the region where it is cost-effective, feasible, and appropriate to reduce reliance on imported water and wastewater discharges. Current administrative impediments to increased use of wastewater should be addressed.

SCAG staff comments. The Draft EIR does not provide a discussion on reclaimed water. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive or detracts from the achievement of this policy. Based on the information provided in the Draft EIR, we are unable to determine if the Project is consistent with this core RCPG policy.

Response: The production and use of tertiary treated water by the Coachella Valley Water District is addressed on pages III-89 and III-90 of the Draft EIR, and Mitigation Measure Item G on page III-95 clearly states the City's intention to support the continued use and future expansion of tertiary treated water in the planning area.

F.24. Comment: Outdoor Recreation

9.01 Provide adequate land resources to meet the outdoor recreation needs of the present and future residents in the region and to promote tourism in the region.

SCAG staff comments. The proposed Project provides for approximately 14,120-acres of open space for park facilities, golf courses, open space and watercourse. The Project is supportive of this ancillary RCPG goal.

Response: Comment noted.

F.25. Comment: *9.02 Increase the accessibility to open space lands for outdoor recreation.*

SCAG staff comments. See SCAG staff comment for goal 9.01. The Project is supportive of this ancillary RCPG goal.

Response: Comment noted.

F.26. Comment: *9.03 Promote self-sustaining regional recreation resources and facilities.*

SCAG staff comments. The Draft EIR does not discuss the subject of self-sustaining regional resources and facilities. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive or detracts from the achievement of this policy. Based on information provided in the Draft EIR, we are unable to determine if the Project is supportive of this ancillary RCPG goal.

Response: As described in Section III-A (Land Use Compatibility), the proposed Plan provides for 14,120± acres of Open Space lands, including park facilities, open space, golf course, and watercourse lands. Policies and programs contained in the General Plan Land Use and Parks and Recreation Elements support the continued development of public and private recreational facilities, including golf courses and a range of neighborhood, community, and regional parks. As per these policies and programs, the City is required to utilize Quimby Act standards to charge park fees and facilitate future park development in residential subdivisions, and to budget for the development and maintenance of additional parks to meet the future needs of City residents. The City will also consult and coordinate with local school districts regarding the shared use of public school, park and recreation facilities. In this regard, the General Plan is supportive of the above-referenced RCPG goal.

F.27. Comment: *9.04 Maintain open space for adequate protection of lives and properties against natural and man-made hazards.*

SCAG staff comments. The Draft EIR does not discuss the subject of open space for the protection of lives against natural and man-made hazards. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive or detracts from the achievement of this policy. Based on information provided in the Draft EIR, we are unable to determine if the Project is supportive of this ancillary RCPG goal.

Response: The goals, policies, and programs set forth in the Open Space and Environmental Hazards Elements of the General Plan are supportive of this RCPG goal. Policies 2 and 5 of the Open Space Element state that the following hazardous areas shall be maintained as open space, where appropriate: hillsides and alluvial fans with slopes exceeding 20 percent, earthquake faults, floodways, unstable slopes, and areas susceptible to liquefaction. Policy 1 of the Flooding and Hydrology section of the Environmental Hazards Element requires that major flood control facilities be designated as Open Space/Watercourse and used only for

flood control, open space, and recreational purposes, as appropriate. The proposed Land Use Plan and corresponding map designate 602± acres for Watercourse purposes, including levees, stormwater channels, debris basins, and other stormwater management facilities. Finally, the Hazardous Materials section and the Emergency Preparedness section of the Environmental Hazards Element address issues of man-made hazards, and the City's ability to respond to these hazards. These policies and implementation strategies are designed to protect life and property from the impacts of geotechnical and flooding hazards.

F.28. Comment: *9.05 Minimize potentially hazardous developments in hillsides, canyons, areas susceptible to flooding, earthquakes, wildfire and other known hazards, and areas with limited access for emergency equipment.*

SCAG staff comment. See SCAG staff comments on policies 3.22 and 9.04. The Project is partially supportive of this ancillary RCPG goal.

Response: The General Plan land use map, as well as the flooding and geotechnical maps provided in the EIR, clearly delineate the constraint areas cited in the comment. Most areas of potential flooding are designated as Watercourse, and according to Policy 8 of the Flooding and Hydrology section of the Environmental Hazards Element, the construction of new critical facilities shall be prohibited within the boundaries of the 100-year floodplain. Several General Plan policies reiterate the City's continued commitment to and implementation of the Hillside Zoning Ordinance, which prohibits development on steep slopes and hillsides. Also please see Response 27, above.

F.29. Comment: *9.08 Develop well-managed viable ecosystems or known habitats of rare, threatened and endangered species, including wetlands.*

SCAG staff comments. See SCAG staff comments on policy 3.20. The Project is consistent with this core RCPG goal.

Response: Comment noted.

F.30. Comment: As noted in the Summary of SCAG Staff Comments, the Final EIR should address the relationships (consistency with core policies and support of ancillary policies) to SCAG's Regional Comprehensive Plan and Guide and discuss any inconsistencies between the proposed project and applicable regional plans.

Response: As noted in the responses provided above, the Draft Comprehensive General Plan and EIR are consistent with and responsive to the core and ancillary policies of the SCAG Regional Comprehensive Plan and

Guide. No meaningful inconsistencies exist between these two sets of documents.

F.31. Comment: All feasible measures needed to mitigate any potentially negative regional impacts associated with the proposed project should be implemented and monitored, as required by CEQA.

Response: The General Plan and EIR include policies and programs requiring the City to continue to coordinate efforts in the areas of air quality, transportation, flood control and hydrology, open space, land use, water resources, public education, hazardous materials and emergency preparedness, among others. Further, the General Plan reiterates the City's commitment to regional government, in the form of the Coachella Valley Association of Governments throughout. The EIR and General Plan clearly include all feasible measures to mitigate regional impacts.

G. THE VISTA SANTA ROSA ASSOCIATION

G.1. Comment: We are concerned not only about the impact of the General Plan on the areas east of the current City limits of La Quinta, but also the cumulative impact of the Plan on the region, including the current incorporated city.

Response: Comment noted.

G.2. Comment: As a general observation, it is our opinion that there is insubstantial evidence presented and inadequate analysis of Project Alternatives. With respect to the “Preferred Plan:”

Section III A&B: Land Use and Agricultural Resources: It is our opinion that the Low Density and Very Low Density designations for the land east of the city limits would encourage urban sprawl which is specifically discouraged by State Statute.

Response: Although implementation of the proposed General Plan will facilitate the development of low and very low-density residential development in the easterly portion of the planning area, General Plan land use policies and programs are responsive to the need to prevent urban sprawl. Policy 6 of the General Plan Land Use Element requires the City to promote in-fill development by giving top priority to capital improvement projects in developed areas of the City. Similarly, Residential Policy 2 of the Land Use Element encourages development adjacent to existing neighborhoods and infrastructure, and Residential Policy 3 indicates that the City will discourage scattered development of residential subdivisions by requiring necessary roadway and infrastructure improvements and extensions to serve new development. The Agricultural Overlay is another planning mechanism designed to implement these strategies. As described in Table III-9 of the Draft EIR, the Agricultural Overlay has been applied to 17,615± acres of lands in the easterly portion of the planning area, and will allow for the continuation of existing agricultural operations, as long as the property owner so desires.

G.3. Comment: Furthermore, the absence of any specific wording of the “Agricultural Overlay” makes it impossible to determine and analyze the impact on existing land uses. It is our belief that the wording of Agricultural Overlay may significantly limit the current agricultural uses, especially animal husbandry.

Response: The Agricultural Overlay, as defined on pages I-15, III-24, and III-28 of the DEIR, recognizes the importance of the agricultural community in

the south-central and southeasterly portions of the planning area, and demonstrates the City's commitment to maintaining existing agricultural operations. Any agricultural land use within this overlay area shall be allowed to continue until such time as the landowner chooses to develop. The intent of the proposed General Plan is clearly to allow existing agricultural interests to continue, regardless of the specific type of activity. Potential impacts to existing land uses are analyzed in Section III-B of the EIR.

The General Plan is a broad-reaching policy document, and as such, it is beyond the scope of the General Plan to address specific standards of the Agricultural Overlay. As described in Policy 7 and Program 7.1 of the General Plan (page 19), specific protocols and standards of the Agricultural Overlay will be addressed in the City's zoning ordinance after adoption of the General Plan. The hearings held in September, November and December of 2001 by the Planning Commission and City Council included presentation of text for this zoning section, which is closely modeled after the County zoning ordinance currently in effect. The Commission and Council will continue their consideration of this text throughout the adoption process of the Plan. In addition, the City's Transfer of Development Rights provisions (Section 9.190) shall be considered for inclusion in the Agricultural Overlay district, thereby providing an incentive for the long-term preservation of agricultural parcels in the planning area.

G.4. Comment: Furthermore, it appears that home occupancy business uses under the city plan would be more restrictive than the current regulations under Riverside County zoning regulations, and the resulting impact is not addressed in the Draft EIR.

Response: The General Plan does not impose any limitations on home occupations or home businesses. Issues concerning home occupations are currently, and will continue to be addressed in the City's zoning ordinance (Title 9 of the Municipal Code). However, the proposed General Plan supports the continued operation of home occupations, as described in Program 5.1 of the Traffic and Circulation Element, which encourages the City to facilitate use of the home occupation ordinance. Similarly, according to Mitigation Measure F (Draft EIR, page III-59), the City shall encourage the utilization of home-based employment as a means of minimizing the number and length of vehicle trips traveled within and in the vicinity of the City.

G.5. Comment: An additional issue of concern is that the "Kohl Ranch" development is not included in the Agricultural Overlay which means that if the City

should annex that area also, it could not be continue to be cultivated pending development.

Response: The Kohl Ranch Specific Plan was approved for mixed-use urban development by Riverside County before the City of La Quinta included the site in the City's General Plan planning area. Exhibit III-2 (Recommended Alternative land use plan) reflects projects as they have been approved by Riverside County, and therefore, the Kohl Ranch Specific Plan is not included in the Agricultural Overlay.

Any existing land use, regardless of whether it is permitted under the land use designation in which it occurs, can continue as a legal non-conforming use. If the Kohl Ranch site remains in agriculture at the time another jurisdiction annexes it, existing on-site activities would be able to continue as a non-conforming use indefinitely.

G.6. Comment: The entire premise of the General Plan and Draft EIR seems to be that the areas east of the city limits will be developed at an average of 3 units per acre at a fairly steady pace; however, as the economy of the region would be drastically altered by the conversion of agricultural land to "country club" or standard subdivisions, the impact of the region is not adequately addressed.

Response: The General Plan and Draft EIR make no assumptions about the future rate of growth in the planning area. In fact, they clearly state that, although the General Plan will provide opportunities for development on these lands, it is unclear whether or to what extent the conversion of agricultural lands to urban development will actually occur (EIR page III-26, 1st paragraph; page III-162, 1st paragraph). For analysis purposes, the EIR assumes that future residential development will occur at a rate of 75% of the maximum density permitted. Where the maximum density is 4 dwelling units per acre (LDR), the EIR assumes that 3 units will be constructed per acre at General Plan buildout. Where the maximum density is 2 units per acre (VLDR), the EIR assumes that 1.5 units per acre will be developed at buildout. These assumptions have been made to reflect actual levels of development in the planning area and broader Coachella Valley.

The potential economic impacts of the proposed Plan are addressed in Section III-M of the Draft EIR, including analysis of potential costs and revenues associated with buildout of land in the easterly portion of the planning area. The City has identified that the impacts associated with the long-term loss of agricultural lands will be significant (EIR page III-28, 2nd paragraph, last sentence) and may not be mitigatable. According to Section 15093 of the California Environmental Quality Act, when

deciding whether or not to approve a proposed project (in this case, the proposed General Plan) the City must balance the benefits of the project against its unavoidable environmental risks. Where the decision of the City Council allows the occurrences of significant effects which are identified in the EIR, but are not mitigated, the City must prepare a written Statement of Overriding Considerations, which explains the specific reasons for its action based on the EIR and/or other information in the record. The City Council, therefore, will be ultimately responsible for weighing the benefits and risks of the proposed Plan and deciding whether or not to adopt it.

G.7. Comment: Additionally, the report states that “Farmers and ranchers may be exposed to increased noise associated with household mechanical equipment and traffic generated by new residences. Residents of low-density developments may be exposed to operational noise generated by farm equipment, odors from farm animals and organic or chemical crop applications, and airborne sand and/or dust generated by plowing and harvesting activities.” The mitigation measures on these issues are inadequate to address the problems.

On page III-140, the draft EIR states: “Land use incompatibilities may arise where urban and agricultural lands are adjacent to one another. Fugitive dust generated by disking, plowing, and other agricultural operations could create a nuisance for neighboring development, and fugitive dust generating during the grading and construction phases of new development could adversely impact neighboring farmlands.” A 100 foot buffer would be inadequate to prevent these incompatibilities as anyone who has been in the Coachella Valley on a breezy, not even windy day, can attest.

Response: The General Plan includes a wide range of mitigation measures, which will minimize potential land use incompatibilities to acceptable levels. (see Sections III-B/Agricultural Resources, III-I/Air Quality, and III-J/Noise). The preservation of a minimum 100-foot open space buffer, where residential development is proposed immediately adjacent to agricultural lands, is only one component of a broader mitigation package. The 100-foot buffer represents a minimum. Ultimately, the standard will be established in the zoning ordinance and may exceed 100 feet.

The Coachella Valley has a history of exceeding federal fugitive dust (PM₁₀) emissions standards and, as mentioned in the comment above, its natural wind events further exacerbate this condition. All urban and agricultural development is and will be required to comply with local and regional fugitive dust control plans set forth by the City, Coachella

Valley Association of Governments, South Coast Air Quality Management District, and other public agencies to mitigate cumulative air quality impacts. However, severe wind events sometimes create temporarily unacceptable conditions both in urban and in agricultural areas. The mitigation included in the EIR will provide sufficient protection against typical conditions, and will therefore lower impacts from and to urban and agricultural land uses.

G.8. Comment: At the very least, the City should adopt a “Right to Farm” ordinance.

Response: Comment noted. At hearings held by the Planning Commission and City Council in September, November and December, zoning ordinance and “right to farm” ordinance text was presented and discussed, respectively. In addition, the City’s Transfer of Development Rights provisions (Section 9.190) shall be considered for inclusion in the Agricultural Overlay district, thereby providing an incentive for the long-term preservation of agricultural parcels in the planning area. The City has clearly stated that these municipal code amendments will be needed in the future to accommodate agricultural land uses. All ordinances pertaining to agricultural activities will be adopted after adoption of the General Plan. Please also see responses to Comment #3, above.

G.9. Comment: It is our opinion that the Plan is inadequate as it indicates that “most” of the roadway segments will operate at Levels of Service “D” on building of the proposed General Plan. Additionally, the need to move tractors and other agricultural equipment is not adequately analyzed, nor are the provisions for regional horse trails, and their impact on circulation taken into consideration. Certainly one of the most glaring problems with traffic plans in the City is the recent installation of the traffic circle at Ave. 52 and Jefferson Streets which has potential catastrophic consequences for anyone attempting to transport horses, other livestock, or heavy equipment via trailer through the intersection.

Response: The La Quinta General Plan Traffic Model analyzed buildout traffic levels for approximately 278 roadway segments in the planning area. Of these, 263 (94.6%) are projected to operate at acceptable levels-of-service “D” or better, and 15 (5.4%) are projected to exceed typical Average Daily Trips (ADT) capacities. It is worth noting that 8 of these 15 roadway segments are projected to exceed capacity by only 3% or less of roadway capacity. All 20 intersections modeled are anticipated to operate at acceptable levels-of-service “D” or better. Although a roadway segment may be identified as exceeding the allowable capacity, intersection improvements may allow the endpoints of a segment to operate acceptably. Recommended intersection geometries provided in Exhibit III-14 and cross-sections described in Exhibit III-12, and

numerous programs and policies described in the General Plan Traffic and Circulation Element, are expected to reduce potential traffic impacts along these roadway segments to acceptable levels.

The General Plan Traffic and Circulation Element is responsive to the potential need for equestrian trails, and requires the City to develop and encourage the use of continuous and convenient multi-purpose trails, with the potential for increased bicycle, *equestrian*, golf cart and other non-vehicular use (Policy 7). Exhibit 3.10 illustrates proposed trail routes in the planning area. Policies and programs set forth in the Open Space and Parks/Recreation Elements also address the need for a comprehensive multi-purpose trails network, and specifically advocate the consideration of a trail that links the eastern half of the planning area with existing and planned equestrian trails, as well as coordination with adjoining communities and other appropriate agencies, including the Coachella Valley Trails Council, in planning optimal trail routes and connections.

The City is responsible for monitoring local traffic conditions and safety concerns, and making periodic adjustments to its roadway network through capital improvements and maintenance management programs. This includes routine monitoring of local intersections, including the roundabout intersection at Jefferson Street and 52nd Avenue. The roundabout offers several benefits to the local circulation network, including slower traffic speeds and reductions in unnecessary stop delays. The Vehicle Code allows all types of vehicles on public roadways. This is currently the case under County jurisdiction, and will not change under City jurisdiction. The General Plan and EIR include a wide range of policies and programs directed at preserving the safety of the local transportation network and minimizing potential traffic conflicts.

G.10. Comment: The General Plan's anticipated buildout at an average of 3 houses to the acre is excessive and irresponsible until, and unless, the dangers of collapsible soils and ground subsidence are demonstratively solved. Although CVWD has operated a pilot recharge facility, it is still in the experimental stage and even if successful, a full-scale facility is years in the future. Indeed, CVWD has just received a grant from the State for further study.

Response: The General Plan does not anticipate that buildout will occur with an average of 3 houses per acre. It is understood that residential development in the City and broader Coachella Valley generally has not occurred at the maximum densities permitted. To provide an adequate representation of actual levels of development in the planning area, the

EIR assumes that buildout will result in development at 75% of the maximum density permitted. The General Plan Land Use Plan includes 5 residential land use designations, each with its own range of permitted densities. Where the maximum permitted density is 4 units per acre (LDR), the General Plan assumes buildout will result in the development of 3 units per acre. However, where the maximum permitted density is 16 units per acre (HDR), the General Plan assumes buildout will result in the development of 12 units per acre. This pattern of assumptions is applied to all 5 residential land use designations.

The potential hazards associated with collapsible soils and ground subsidence have been addressed in detail in on pages III-64, III-65, and III-89, and Appendix G of the Draft EIR. Appropriate and applicable mitigation measures to minimize these risks, including but not limited to Mitigation Measure Items F, P, and Q, are identified on III-75. The EIR explains that ground subsidence is a valley-wide problem, and mitigation of this hazard will require a regional approach to groundwater conservation. General Plan policies and programs indicate the City's continued support of the groundwater recharge program, the use of recycled and tertiary treated water, and other water conservation measures.

G.11. Comment: The issue of wind erosion and damage from blowing sand are grossly under-rated. Reduction of the flood potential of the Whitewater River will not solve the existing problems.

Response: The regional wind erosion and blowsand hazard is described on pages III-65, III-127, III-128, III-129, III-130, and III-132, and Exhibit III-18 identifies various wind hazard zones within the planning area. This hazard is described in greater detail in Appendix G, "Seismic, Geologic, and Flooding Hazards Sections of the Technical Background Report for the Safety Element for the City of La Quinta." Neither the General Plan nor the Draft EIR imply that reduction of the flood potential of the Whitewater River will solve the existing problem; however, it is expected to contribute to a reduction in local blowsand hazards. Mitigation Item G on page III-75 identifies a number of other measures for reducing fugitive dust, requires approval of a soil erosion prevention plan prior to the issuance of grading permits, and refers the reader to Section III-I (Air Quality), which identifies additional mitigation measures.

G.12. Comment: While improved building codes have reduced the potential for collapse of buildings and deaths as a result of seismic activity, significant damage to structures, city infrastructure, and community social life are inescapable in the event of a major tremor. The Draft EIR anticipates "a

22% probability of the San Andreas Fault generating a magnitude 7.0 earthquake before the year 2024” and “the slip rate of the San Jacinto fault is estimated at between 7 and 17 mm/year, and is capable of generating magnitude 6.5 to 7.5 earthquakes.” Added to the initial impact of the tremor are liquefaction, settlement, slope instability, and inundation. All of these issues are inadequately analyzed and mitigated, not to mention their cumulative impacts. To encourage urbanization of an area subject to these factors is insupportable.

Response: Comment noted. Section III-D (Soils and Geology) of the Draft EIR includes detailed descriptions of the above-described geotechnical hazards, mapping of various geotechnical hazards areas in the planning area, and numerous mitigation measures designed to reduce potential impacts to acceptable levels. Further detail and explanation of potential hazards and appropriate mitigation measures is provided in Appendix G, the background geotechnical report for the General Plan Update. All development shall be required to comply with the mitigation measures established in the EIR and all policies and programs set forth in the General Plan. Cumulative geologic/seismic impacts are addressed on page VIII-4 of the EIR.

G.13. Comment: As shown above, the Draft EIR fails to view the hydrology issues in the context of cumulative impacts. At the present time, residential development will place an additional burden on the over drafted water table, as residential uses (including potable water) are served by water pumped from the aquifer.

Response: Cumulative hydrologic and water resources impacts are addressed on pages VIII-4 and VIII-5 of the EIR. The General Plan acknowledges that future residential development will result in increased demand for groundwater resources and identifies a wide range of appropriate mitigation measures on pages III-94 and III-95.

G.14. Comment: The engineering firm for the Coral Mountain Project analyzed the water supply demands of that project, which is a country club/residential development of the type that can be anticipated to be built throughout the annexation and planning area. They calculated that development alone would contribute an additional average demand of 1.8 acre-feet per year on the groundwater. That project is only the “tip of the iceberg.”

Response: Comment noted. The commentor incorrectly interpreted the content of the letter. The letter specifically states that the Coral Mountain project will utilize 391 acre feet of groundwater, and 1,341 acre feet of canal water for irrigation annually. (Source: Letter dated June 7, 2001, Pacific

Advanced Civil Engineering, Inc.) On a per unit basis, this represents 0.32 acre feet per year.

G.15. Comment:

The residents of the Vista Santa Rosa have reported that the water levels in their wells have been dropping for years, with a significant acceleration of the rate since PGA West was approved. The draft Coachella Valley Water Management Plan states that groundwater demand in the lower valley currently exceeds recharge by 41,700 acre feet per year and that groundwater levels have decreased 60 feet or more in some parts of the lower valley; our residents can verify those findings from empirical experience.

The draft Water Management Plan states that “it is clear that the continued decline of groundwater levels is unacceptable” and that “the continued overdraft will have serious consequences for the Coachella Valley”. Short term impacts include increased groundwater pumping costs, and the cost of deepening wells and installing larger pumps. “Continued decline of groundwater levels could result in substantial and possibly irreversible degradation of water quality in the groundwater basins.”

Areas of the lower Coachella Valley are already experiencing subsidence by excessive groundwater overdraft. As the water in the aquifer is depleted, the space between soil particles is lost, which leads to compaction, which CVWD representatives admit could permanently reduce the capacity of the aquifer. If capacity is diminished, even if a way to recharge the aquifer is found, its ability to receive the water will be significantly reduced or lost. As stated above, CVWD has not proven the physical ability to adequately recharge the aquifer. Indeed, the CVWD Draft Water Management Plan states “the maximum amount of potential recharge in the lower valley is not known at this time.”

Additionally, this Water Management Plan is itself only a draft, the EIR not to be issued until late in 2001, then it must undergo comment, Public Hearing, and must be adopted by more than one agency; it also seems fated for challenge in court. There is no guarantee that the plan will be adopted as currently written, when it will be implemented, that it will be successful, or if it does stop the overdraft that it will do so in time to prevent significant subsidence.

The draft Water Management Plan notes that the Coachella Valley does not currently have water rights to imported water sufficient to satisfy its current and future demands. The issue of imported water is especially complex as seven states share the Colorado which, like all rivers, is subject to reduced capacity due to climatic conditions. While CVWD

has made an outstanding attempt to acquire additional sources, those efforts have not yet reached fruition. Major urban areas like Los Angeles and Phoenix may not have the “federal water priority” of the Coachella Valley water project, but it is a policies reality that such concentrations of population and industry vital to the economic health and defense capability of the nation will have their basic needs placed in higher priority for delivery, although probably not price.

Response: Comments noted. The draft EIR and General Plan address the current state of overdraft, water quality degradation, CVWD’s groundwater replenishment program, the production and use of tertiary treated water in the planning area, and other water conservation measures supported by the City. CVWD’s Water Management Plan contains a great deal of information regarding current conditions, historic usage, and potential solutions to the overdraft currently being experienced. As such, it represents a valuable tool in the analysis of water usage in the City and its planning area.

G.16. Comment: The State is under directive from the Secretary of the Interior to reduce its use of Colorado River Water by nearly 1,000,000 acre feet annually. If this area does not significantly increase its conservation of water, even without growth, we may have our current allotment reduced. While an argument is made that an acre of agriculture uses the same amount of water as an acre of golf course, or an acre of residential use, that does not mean: that each of these uses depends on water from the same sources; that is could or would be recycled the same way; that the drainage impact on the Salton Sea, a federal concern, would be the same; that the development of currently non-farmed land would not increase the demand on the water supply; that the impact on the nation’s food supply would be the same, etc. The effects of urbanization of the planned area are far, far more complex than what is addressed in the draft EIR and any plan based upon this report is fatally flawed.

Response: Comment noted. The Draft EIR addresses groundwater supply, overdraft, replenishment, demand, quality, and conservation from a local and regional perspective in Section III-F. Analysis and mitigation measures contained therein are based on the most current information provided by the Coachella Valley Water District. They are currently the most accurate and up to date source of information relating to water usage in the Valley. As additional information is developed in the future, individual projects will be reviewed using that information.

G.17. Comment: While extensive coverage has been given to the biological resources and concerns. This is a regional issue, and development of a plan for expansion of the City is premature until CVAG completes its study.

Many forms of animal life can and do co-exist with existing agricultural use of the land which cannot exist with urbanization. Personal observation has acquainted me with the objections of residents of one local country club to the use of their swimming pools, etc. by birds protected by the federal migratory wildlife laws. These same birds cause no problems when they use agricultural reservoirs.

Response: Comment noted. The City is a signatory to a Memorandum of Understanding for the preparation of the "Multiple Species Habitat Conservation Plan" (MSHCP) and will continue to participate in its development. Until such time as the MSHCP is completed, however, the City is not capable of adopting or implementing it. The use of swimming pools or reservoirs by migratory birds may be a temporary nuisance to the pool or reservoir owner, but does not represent an environmental impact.

G.18. Comment: As stated in the EIR, La Quinta contains "one of the most dense concentrations of archaeological sites in California." Additionally, since 1981, "over 120 historic buildings and sites have been recorded in the General Plan planning area." Farming may "turn" the land, but does not pulverize artifacts as development would, as a result the area is culturally extremely sensitive. Additional studies would be necessary to determine to what extent urbanization would destroy sites that future generations could more adequately preserve and/or document. Additionally, the Torres-Martinez and Augustine tribes should be consulted regarding planning urbanization. Until and unless potential impact studies and adequate mitigation measures are developed, the area of potential development should not be expanded.

Response: Both a cultural resources sensitivity analysis and a paleontological resources mitigation plan were prepared for the General Plan planning area and are contained in Appendices B and D, respectively, of the Draft EIR. Potential impacts associated with General Plan buildout are evaluated in Section III-H of the EIR. Given that site-specific cultural resources may not be discovered until future development occurs, the EIR requires that all development projects, which require discretionary city action, be reviewed by a qualified archaeologist or other professional. The EIR also establishes a number of other mitigation measures on pages III-123 and III-124, which will minimize potential impacts associated with General Plan buildout. The General Plan EIR is responsive to the need for Native American participation in preserving cultural resources, and Mitigation Item F clearly states that a Native American representative shall be included in monitoring ground disturbances in areas of high sensitivity.

G.19. Comment: As stated in the draft EIR, “winds suspend and transport large quantities of sand and dust, which can reduce visibility, damage property and constitute a significant health threat.” Additionally, “the Coachella Valley is also susceptible to air inversions, in which a layer of stagnant air is trapped near the ground where it is further loaded with pollutants. When combined with chemical aerosols and other pollutants emitted by automobiles, furnaces and other sources, this process can result in substantial haziness and a deterioration in ambient air quality.” The mitigation measures are inadequate in addressing these conditions.

Response: The mitigation measures set forth in Section III-I (Air Quality) of the Draft EIR are responsive to the most recent air quality studies and directives issued by the South Coast Air Quality Management District, Coachella Valley Association of Governments, California Air Resources Board, and the U.S. Environmental Protection Agency. They address air quality pollution control issues from both a local and regional perspective and are believed to be adequate in mitigating potential project-related impacts. Individual project proposals shall be reviewed on a case-by-case basis to assure the implementation of site-specific dust control measures.

G.20. Comment: Merely looking at the chart on page III-150, leads one to know that the impacts of the General Plan are staggering. Anyone who has visited a large urban area knows that it would be impossible to maintain acceptable noise levels when increasing the size of a city from approximately 24,000 to 207,000.

Response: Comment noted. All development in the planning area shall be required to comply with the standards and provisions of the City’s noise ordinance.

G.21. Comment: The impact of the planning is difficult to assess when viewed in light of the recent decisions of the City Council to allow a significant variance for the new hotel from its “Cove” height restrictions, and to allow a berm of up to 19’ tall on Avenue 54, a street that was to be designated an agrarian corridor. The mitigation measures indicate that the “City shall establish and implement urban design standards which protect scenic viewsheds and enhance community cohesion.” Absent precise wording on these standards and guarantees that the standards will be followed, it is impossible to analyze the impact of the new General Plan.

Response: The existing General Plan does not provide the standards which would aid in implementing viewshed protection. The new proposed General Plan establishes programs which will require subsequent adoption of zoning standards to allow such protection. It is beyond the scope of the

General Plan to establish specific urban design standards for various neighborhoods and districts within the planning area. These efforts have been and shall continue to be addressed in the City's zoning ordinance. The adoption of these standards will occur through the public hearing process, which will allow the public to contribute to the new standards.

G.22. Comment: Section L. Public Services and Facilities:

This entire section is based upon conjecture about future development of a huge land area.

Response: The Public Services and Facilities section includes detailed discussion of Existing Conditions, Project Impacts, and Mitigation Measures. Like other sections of the EIR, project impacts are based on rational assumptions about future levels of development in the planning area at General Plan buildout. It is impossible to anticipate whether and to what extent future development will actually occur, and it is beyond the scope of the General Plan to analyze project-specific impacts to public facilities and services.

G.23. Comment: Significant developer fees or new community facilities districts would be necessary to adequately provide for the increase in student population.

Response: Comment noted. The Mitigation Measures section on pages III-169 and III-170 of the EIR states that developers will continue to be assessed statutory school mitigation fees, and it cites additional funding mechanisms available to school districts.

G.24. Comment: The city library is currently significantly under-served by County standards, which even with the new building plans, would be exacerbated by the buildout and the plan is vague on its correcting these problems.

Response: Comment noted. A number of policies and mitigation measures regarding the provision of library facilities are clearly stated on page III-171 of the EIR, and page 71 of the General Plan. These statements are responsive to the need for expanded library space and resources.

G.25. Comment: Policing, fire protection and healthcare projections are woefully inadequate and likely to remain so with the fiscal shortfalls projected in the draft EIR.

Response: As described by the policies and programs in Chapter 7 of the General Plan, and the Mitigation Measures in Section III-L of the EIR, the City shall be responsible for routinely assessing staffing and facilities levels

as the planning area builds out to assure that adequate police and fire services are provided. Although the City can consult and confer with local and regional healthcare facilities, such facilities are privately owned and operated and will continue to plan for growth as demand requires. General Plan buildout is anticipated to result in a positive annual cash flow of approximately \$20 million, not a fiscal shortfall (please see Table III-46 and Section III-M of the EIR).

G.26. Comment: Once again, the plan covers too large an area to adequately project and plan for waste water disposal.

Response: Pages III-181 and III-182 address existing wastewater collection and treatment services and projected impacts associated with General Plan buildout. It is beyond the scope of the General Plan to analyze project-specific impacts to public facilities and services, and at this time, it is not known whether and where future development will occur. Therefore, the General Plan requires the City to consult and coordinate with the Coachella Valley Water District to assure that adequate waste water facilities and services are provided.

G.27. Comment: Basically, the planning area is simply too large for adequate planning of infrastructure for a city of the size of La Quinta. Far too many projections are based on “developer fees” and not on sustainable revenue sources. Maintenance of services must be an extreme consideration when the buildout of Annexation No. 12 would result in an annual shortfall of approximately \$5,387,982, and buildout of the SOI amendment would result in a negative annual shortfall of \$1,998,748.

Response: The General Plan is intended to function as a broad-reaching, long-range planning document that addresses future development in a relatively large area. Given that it is impossible to determine whether and where future development will occur, the General Plan provides a wide range of policy directives that require the City and other public service providers to analyze and provide for public services as demand requires. No public service provider serving the planning area has indicated that it will have difficulty serving future development at General Plan buildout. A wide range of funding mechanisms will be employed to expand services and infrastructure to new development, including developer fees, special district assessments, and public investment. Developers are expected and required to pay their fair share of development improvements.

Although buildout of Annexation Area No.12 and the SOI amendment area themselves is expected to result in annual fiscal shortfalls, when rolled into the broader General Plan project, buildout of the entire

planning area would result in positive annual cash flow of approximately \$20 million (please see Table III-46).

G.28. Comment: The draft EIR fails to adequately address the current problems inherent in the infrastructure of the City much less the problems that will develop if additional area is annexed with the resulting shortfalls; at the very least, a new EIR should be required for any annexations or changes of Sphere of Influence as the current draft does not only fail to fully analyze alternative plans, it also fails to analyze the impact of changed land use on the regional economy. The fatal flaw of the General Plan and draft EIR is the proposed development and enlargement of a city that already has significant problems, including the fact that approximately 49% of the land within the city limits has not been developed despite a State policy to discourage urban sprawl.

Response: Comment noted. Please see responses to comments 22 through 27, above, regarding the provision of future infrastructure and fiscal projections, and response to comment 2 regarding urban sprawl. The standards by which the City reviews projects and determines whether an EIR will be required are strictly governed by CEQA.

G.29. Comment: For all of these reasons, and those submitted by Mr. Wiedlin and Mr. Mitchell, it is our opinion that the Draft EIR is significantly inadequate to serve as an environmental impact report for any additional annexations or expansion of the City's sphere of influence to the east of the current city limits.

Response: Opinion noted.

H. CITY OF COACHELLA

H.1. Comment: The City of Coachella is pleased to have received a copy of the above referenced document for review and comment. Staff has conducted an initial review of the DEIR and forwards comments for your consideration. Staff had requested an extension to October 3, 2001, to allow time for the City Council of the City of Coachella to review staff comments prior to submission to you. Since that request was not granted, the staff comments are being forwarded to you by your September 10th deadline. Additional comments may be submitted at your hearing. Review by the City Council of the City of Coachella will not occur until their meeting of September 26, 2001, at which time comments will be forwarded to you.

Response: Comment noted.

H.2. Comment: The proposed General Plan Planning Area, including proposed Annexation No. 12 is an ambitious one, that could potentially result in significant impacts to the City of Coachella in several areas of concern.

Response: Comment noted.

H.3. Comment: The preservation of the agrarian and equestrian lifestyle and resources within the south-central and southeastern portion of the Planning Area is of major concern. Resulting loss of agricultural lands and resources through conversion of existing agricultural lands to residential land uses could pose a significant threat to the traditionally strong economy of the Coachella Valley. Preservation of these areas is vital to the economic well-being of the agricultural community of the Coachella Valley. From a preservation standpoint, the proposed Agricultural Overlay (as depicted in the Recommended Alternative and Alternative II) is extremely important to include in the general plan. It is understood that the proposed Agricultural Overlay will allow current agricultural land uses to continue until the property owner chooses to develop the land. However, it is not clear whether vacant agricultural lands will be allowed to begin agricultural activities at the property owners' discretion.

Response: Comment noted. Currently, the City has no jurisdiction over land in the south-central and southeasterly portions of the planning area, and any land use permitted by Riverside County will continue to be allowed. Should the City annex these lands in the future, new agricultural activities would be allowed subject to the provisions of the zoning

ordinance. Lands lying fallow at the time of annexation would be considered to be agricultural land uses.

H.4. Comment: The proposed 100-foot minimum buffer between agricultural land uses and proposed residential areas and other lands uses seems too little to realistically mitigate the typical agricultural activities (pesticides, fertilizers, dust, noise, odors, etc.) upon residential areas. Some crops require activities and techniques done at night-time and early morning hours, using both manual labor and machinery that can be quite noisy at 100-feet away. Rather, it is suggested that a minimum 300 to 500 foot buffer might be considered a more adequate mitigation measure.

Response: The proposed 100-foot buffer would be required in addition to any landscape easements, roadways, greenways, and building setbacks required by the City during the project review process. Therefore, the actual buffer zone between agricultural activities and urban development is likely to be much larger, and the 100-foot buffer represents a minimum. Ultimately, the standard will be established in the zoning ordinance and may exceed the above-referenced mitigation measure. The City has also committed to the addition of right to farm ordinance text in hearings held before the Planning Commission and City Council in September, November and December of 2001. In addition, the City's Transfer of Development Rights provisions (Section 9.190) shall be considered for inclusion in the Agricultural Overlay district, thereby providing an incentive for the long-term preservation of agricultural parcels in the planning area.

H.5. Comment: Preservation of the equestrian lifestyle in the Planning Area should be a priority to retain existing equestrian properties and to provide for the development of new properties as desired by landowners.

Response: The Agricultural Overlay applies to both agricultural and equestrian land uses. The General Plan and Draft EIR clearly indicate the City's commitment to maintaining these existing land uses until such time as the landowner chooses to develop.

H.6. Comment: With a 113% increase in dwelling units (at 75% maximum densities at build-out) there will be significant impacts to the local roadway system and to airport traffic, with increased daily trips and airport service expansion. The projected increase in residential, commercial and industrial vehicular traffic, will potentially overburden roadways, bridges, and intersections adjacent to and within the City of Coachella. Specific mitigations such as improvements to the streets, interchanges, bridges, and grade-separations are not identified in the Draft EIR making it impossible to identify the level of significance of the impacts after

mitigation. This needs to be corrected prior to the adoption of the EIR. Furthermore, Level of Service D is not acceptable as the standard LOS for most areas within the City of Coachella as is currently proposed in the DEIR.

Response: The ultimate improvements required to all General Plan roadways are illustrated throughout the Circulation Element, and section III-C of the EIR, including roadway cross-sections at buildout. The General Plan requires that development which occurs adjacent to those roadways construct improvements to meet the buildout requirements at the time development occurs. Furthermore, the City has implemented a Developer Impact Fee program to address city-wide transportation needs. All future projects will be required to participate on a fair share basis, based on impacts of the project. A Program EIR for a General Plan is not the appropriate location for a discussion of individual roadway improvements. The individual review of projects as they occur will require such specific review.

The Level of Service for intersections in the General Plan is proposed to be LOS D. Until such time as the City annexes any property, it cannot impose its standards on that property. The City's General Plan Level of Service has not impact on streets currently within the City of Coachella, where that City's standards are currently enforceable.

H.7. Comment: Considering the high number of dwelling units proposed by the Recommended Alternative, the consumption of water and water availability is of major concern on a valley-wide scale, given the current overdraft condition. This begs the question of whether there is enough water for the projected growth in the Planning Area. The 55% reduction in water consumption at build-out as described for Alternatives I and II are preferable to that described for the Recommended Alternative.

Response: Comment noted. The General Plan and draft EIR include numerous goals, policies, programs, and mitigation measures which reflect the City's commitment to conserving regional groundwater resources. Among these are the City's continued participation and cooperation in expanding CVWD's local groundwater recharge program, the use of recycled and tertiary treated water, the use of native drought-tolerant landscape materials, and the implementation of water conservation measures. As described in Mitigation Item C on page III-85 of the DEIR, all future development proposals shall be analyzed by the City, Coachella Valley Water District, and/or Myoma Dunes Mutual Water Company to determine potential project-specific impacts on groundwater resources.

H.8. Comment: There is also concern for water quality, as each alternative discussed in the document results in additional urban development and potentially new pollutants to the groundwater supply. It is agreed that conversion from private septic systems to a sewer system could reduce the threat of groundwater contamination. Additional discussion of potential impacts to water supply and systems adjacent to the Planning Area should be included, especially as it impacts the City of Coachella.

Response: The draft EIR addresses applicable water quality regulation and potential impacts to water quality on pages III-90, III-91, and V-21. The draft EIR and General Plan contain a variety of policies, programs, and mitigation measures that apply to future development in the planning area. The City will continue to review all development proposals for their potential to contaminate surface and ground waters, and will continue to implement federal, state, and regional water quality standards pertaining to the discharge and treatment of pollutants in surface water, both on private lands and public facilities. Additionally, the City will continue to require the development of on-site stormwater retention and/or detention basins to enhance the filtration of runoff and minimize adverse impacts to local and regional water quality. The City shall require, wherever feasible, the extension of the community sewer system to serve new development and minimize the potential risks of groundwater contamination from septic tanks and seepage pits. Given these measures, no significant adverse water quality impacts are expected to affect the City of Coachella or any other community.

H.9. Comment: It is clear that there could be significant adverse impacts to the local air quality from the build-out of the proposed Planning Area under all project alternatives. Traffic emissions, site disturbance, grading and construction activity, and increase in utility consumption will lead to an increase in air pollution for the valley.

Response: Comment noted. The Draft EIR addresses potential air quality impacts generated by each of the above-cited sources in Section III-I (Air Quality) and Section V (Project Alternatives).

H.10. Comment: Projected development within the Planning Area under any of the project alternatives will result in a significant increase in population which will be subject to potential seismic geological hazards.

Response: Comment noted. The Draft EIR addresses potential geotechnical hazards in Section III-D (Soils and Geology) and Section V (Project Alternatives).

H.11. Comment: Projected development of the Planning Area under any of the project alternatives will result in the need for additional flood protection facilities and improvements.

Response: Comment noted. Potential impacts to flood control facilities are addressed in Section III-E (Hydrology) and Section V (Project Alternatives) of the Draft EIR.

H.12. Comment: Projected development of any of the project alternatives could result in potential adverse impacts to wildlife and native plants. Exotic plant species will be introduced into the areas as development occurs that could dominate plant communities. Domestic pets could intrude into remaining natural habitat areas and adversely impact wildlife.

Response: Comment noted. Potential impacts to biological resources, including plant and animal species, are addressed in Section III-G (Biological Resources), Section V (Project Alternatives), and Appendix C of the Draft EIR. The General Plan also includes a program which will result in the development of a prohibited plant list. Individual project mitigation measures will include fencing to limit domestic animals if such a mitigation measure is needed at that particular project site.

H.13. Comment: There will be an increase in various noise generators in the proposed Planning Area that could adversely impact the Planning Area as well as adjacent communities. Vehicular traffic will be the dominate (sic) source of the noise impacts. There could be incompatibilities and conflicts between agricultural land uses and proposed residential land uses if a larger buffer area is not required.

Response: Comment noted. Potential noise impacts associated with General Plan buildout are addressed in Section III-J (Noise), Section V (Project Alternatives), and Appendix E of the Draft EIR. See response to Comment 4, above, regarding required buffer areas between agricultural and residential land uses. The right to farm ordinance text being considered by the City includes notification of property buyers to alert them to the occurrence of agricultural activities. Furthermore, future projects are required to conduct noise studies prior to construction to ensure that exterior noise levels will not exceed 65 dBA CNEL. Should a project be proposed adjacent to existing agricultural development, the impacts associated with the agricultural activities would be analysed in the site specific noise study, and appropriate mitigation measures would be imposed on the residential development.

H.14. Comment: The proposed Recommended Alternative will result in a 113% increase in dwelling units at build-out (at 75% maximum densities) which is a

significant increase in dwelling units and population for this area. Alternative II will result in 41,605 fewer dwelling units than the Recommended Alternative and correspondingly result in fewer adverse impacts between land uses within the proposed Planning Area and adjacent communities.

Response: Comment noted.

H.15. Comment: The City of La Quinta has a wealth of prehistoric and historic resources that should be given the highest level of consideration before they are adversely impacts by the proposed development strategy. Avoidance should be the preferred alternative for preserving these resources wherever possible.

Response: Comment noted. Section III-H, Section V, and Appendices B and D of the Draft EIR acknowledge the wealth of cultural resources which occur in the planning area and address potential impacts associated with General Plan buildout. The paleontological and cultural resources programs and policies provided in Chapters 6 and 9 of the General Plan, as well as the mitigation measures identified on pages III-123 and III-124 encourage the preservation of sensitive cultural resources. Furthermore, the City will continue to require site specific cultural resource studies as projects are proposed. These studies will include mitigation measures specific to the project and site, in order to protect the cultural resources found on the site.

H.16. Comment: There is a potential for significant adverse impacts to vistas and views of the Santa Rosa Mountains, from the City of Coachella, if stringent controls are not placed upon projected development within the proposed Planning Area. The undergrounding of utilities should be a priority within the proposed Planning Areas. Wireless communication towers and monopoles, utility towers and poles, signs, and multi-story buildings, should be subject to strict development standards that will ensure minimal impacts to viewsheds. The City of Coachella requests building heights to be limited to protect view corridors of the local mountains from properties within the La Quinta.

Response: Comment noted. Potential visual impacts associated with General Plan buildout are addressed in Section III-K of the Draft EIR. Implementation of the mitigation measures provided on pages III-162 through III-164, which address signage, outdoor lighting, utility undergrounding and equipment design, and other aspects of community design, will reduce these impacts to acceptable levels. Policies 13, 14, and 15 of the Traffic and Circulation Element of the General Plan establish primary, secondary, and agrarian Image Corridors throughout the planning area to

further protect the aesthetic value of regional viewsheds (see also Exhibit 3.6 of the General Plan). Policies 3 and 4 on page 73 of the General Plan address undergrounding of utility and electrical wires, and the design and integration of utility equipment into the surrounding environment. Individual development plans shall continue to be reviewed for their compliance with the standards set forth by the City's zoning ordinance. The existing General Plan does not provide the standards which would aid in implementing viewshed protection. The new proposed General Plan establishes programs which will require subsequent adoption of zoning standards to allow such protection.

H.17. Comment: The City of La Quinta is currently underserved in fire, police, and library services. With such a large proposed Planning Area, it will be critical that adequate services are provided as development occur so that there will not be adverse impacts upon adjacent communities and their service resources.

Response: Comment noted. The policies and programs set forth in Chapter 7 of the General Plan, and the mitigation measures described in Section III-L of the Draft EIR, require the City to routinely evaluate the provision of public services and infrastructure, and to closely coordinate with public service providers to assure that new and existing development is adequately served.

H.18. Comment: Adverse impacts to the agricultural and equestrian lifestyles is potentially significant unless the proposed Agricultural Overlay is adopted as indicated in the Recommended Alternative and Alternative II. There has been a lengthy tradition of these lifestyles in the south-central and southeastern areas of the Planning Area.

Response: Comment noted. The Agricultural Overlay is a proposed land use overlay in the General Plan Land Use Element.

H.19. Comment: The Environmental Summary Matrix does not include a column for the discussion of significance after mitigation for each issue area. Without this information, how can overriding findings be made?

Response: The information is contained in each of the categories listed in the Matrix, in the right hand column. However, the EIR will be amended to include an additional (fourth) column for each category, titled "Level of Significance After Mitigation." The California Environmental Quality Act (CEQA) requires that the Environmental Summary Matrix include a brief summary of the proposed action, its consequences, proposed mitigation measures, and the relative significance of each project alternative. Detailed analysis of each issue of environmental concern and

the significance of the proposed action is provided in Section III, and an analysis of each project alternative is provided in Section V. The information provided within the EIR as a whole is of sufficient detail for the City to determine whether a Statement of Overriding Considerations is necessary and appropriate.

H.20. Comment: There is no discussion about impacts and mitigation measures under Traffic/Circulation [in the Environmental Summary Matrix] for the Desert Resorts Airport.

Response: Comment noted. The Traffic/Circulation portion of the Environmental Summary Matrix is hereby modified to include the following:

Project Impacts

Buildout of the planning area is expected to contribute to a regional increase in air traffic at the Desert Resorts and Bermuda Dunes Airports. Forecasts of future activity at the Desert Resorts Airport indicate that it is expected to accommodate a substantial increase in annual operations and may be capable of accommodating larger aircraft.

Mitigation Measures

The City shall maintain close, on-going consultation with the Riverside County Airport Authority regarding the future expansion of the Desert Resorts Airport and the facilitation of commercial air traffic in the eastern Coachella Valley.

H.21. Comment: Significance levels are not clearly stated for several of the areas of concern. These should be added to the document and to the Project Impacts column of the matrix.

Response: Comment noted. Please see response to Comment #19, above.

H.22. Comment: Discussion needs to be added to the DEIR that identifies specific impacts to the Cities of Indio and Coachella, and quantifiable mitigation measures.

Response: The General Plan and draft EIR include extensive mitigation measures that will directly apply to future development in the planning area, but will indirectly benefit the Cities of Indio and Coachella and other neighboring communities. Among these are the required construction of on-site retention/detention basins to contain and minimize the adverse impacts of urban runoff, the continued maintenance and improvement of local roads and intersections, and the extension of public services and facilities to the southeasterly portion of the planning area. Given the implementation of these and numerous other mitigation measures,

policies, and programs described in the General Plan and draft EIR, implementation of the proposed Plan is not expected to result in significant adverse impacts to neighboring communities. The City shall continue to consider potential impacts to neighboring jurisdictions on a case-by-case basis, as future development proposals are reviewed, and shall continue to consult and coordinate neighboring jurisdictions, wherever necessary.

H.23. Comment: The energy crises need to be discussed in the DEIR, including both electrical supply and natural gas resources.

Response: Comment noted. The Electricity, Existing Conditions portion of Section III-L of the EIR (pages III-185 and III-186) is hereby amended to include the following:

“In 1998, the State of California implemented legislation that deregulated its electric power industry. The legislation mandated rate reductions from some electric companies and allowed consumers of large, investor-owned utilities the option to choose alternative electricity providers. Smaller, community-owned utilities (like IID) were not required to offer their customers alternatives at that time. The primary goal of deregulation was to enhance competition in the electric industry and bring choices to consumers.

The legislation froze rates charged by investor-owned utilities at 1996 price levels. By winter 2000, a significant price gap emerged between wholesale electricity prices and maximum retail prices that utilities were permitted to charge. Wholesale prices typically exceeded the maximum permitted retail prices, making it cheaper not to provide electricity to consumers. Subsequently, many California communities experienced rolling blackouts to save on the state’s power grid. Coachella Valley customers that signed up for voluntary service interruptions, in exchange for price discounts, also experienced occasional power outages.

A true electric power supply problem may exist in California, and the demand for electricity in California appears to be outstripping the combination of state and interstate electricity supplies. Interstate suppliers that sold electricity to California utilities in the past have experienced low winter temperatures and precipitation in recent years. As a result, hydroelectric and other power resources are not as readily available as they once were. Significant federal and state participation in the environmental review process makes permitting difficult in some cases, particularly in meeting applicable air and water quality standards.”

H.24. Comment: Page I-13: Table I-2, Land Use column, O Office84. Is this a typo?

Response: Yes. The spacing of the table has been amended as follows:

Land Use	Total Acres	Dev. Acres	Vacant Acres	Existing Sq.Ft. ²	Future Sq.Ft. ²	Total Sq.Ft. ²
O Office	84	44	40	421,661	383,328	804,989

H.25. Comment: Exhibit III-1: City of La Quinta, Existing General Plan. This exhibit is confusing with the County designations included.

Response: The exhibit accurately depicts existing land use designations in the entire planning area. Land use designations within the City limits are those assigned by the current City of La Quinta General Plan. Land use designations outside the City limits are those currently assigned by the County of Riverside Comprehensive General Plan.

H.26. Comment: Page III-16 is printed twice.

Response: Comment noted.

H.27. Comment: Page III-21: paragraph 1, line 1, “of” should be or.

Response: Comment noted. The sentence is hereby amended as follows:

“The City shall identify potential adverse or unacceptable noise exposures, analyze and assure the efficacy of mitigation programs, and assure construction is in accordance with the approved noise mitigation plan.”

H.28. Comment: Page III-26: Indirect Environmental Impacts section should include discussion on specific impacts to the Cities of Indio and Coachella.

Response: Please see response to Comment #22, above.

H.29. Comment: Pages III-91 and 92: Is there a conflict with the number of dwelling units indicated on Page 91, Paragraph 5, line 2, “78,952 dwelling units...”, and Page 92, paragraph 5, line 2, “...66,811 new dwelling units”?

Response: No. “78,952” represents the total number of dwelling units anticipated at General Plan buildout, including new and existing units. “66,811” represents the number of new units that could be facilitated by the Recommended Alternative (please refer to Tables I-2 and III-2 of the DEIR).

H.30. Comment: Page III-121: paragraph 4, consider stating that the City was actually certified as a CLG in April of 1995; Also, the reference to Appendix K is obsolete.

Response: Comment noted. A discussion of the City's becoming a Certified Local Government (CLG) is provided on page 93 of the General Plan. The reference to Appendix K is hereby deleted from the draft EIR.

H.31. Comment: Page III-143: Subsection Q, should include the requirement that truck loads be covered.

Response: Comment noted. The statement has been amended as follows:

Q. To minimize construction equipment emissions, developers shall:

- Wash off trucks before leaving the site
- Require trucks to maintain two feet of freeboard
- Properly tune and maintain construction equipment
- Use low sulfur fuel for construction equipment
- Require that dump truck loads be covered

H.32. Comment: Page III-166: paragraph 1, this discussion should be updated as the Mountain Vista School opened September of 2000 and is in full operation.

Response: Comment noted. References to Mountain Vista Elementary have been deleted from paragraph 1 on page III-166, and Table III-33 has been modified to include the following information.

School Name	Grade Level	Current Enrollment	Max Capacity
Mountain Vista Elem.	K-6	502	750

H.33. Comment: Page III-170: Existing Conditions, Since the existing library in La Quinta is currently underserved, and the proposed new library will not meet the planning standard, will there not be an impact upon other adjacent libraries?

Response: General Plan Policies 5 and 6 (page 71) and the mitigation measures described on EIR page III-171 require the City to continually monitor library needs and assure that adequate library facilities and services are provided to City residents. Impacts to libraries in adjacent communities are not expected to be significant.

- H.34. Comment:** Page III-185: paragraph 1, line 2, GTE is now Verizon.
- Response:** Comment noted. All references to “GTE” have been amended to read “Verizon.”
- H.35. Comment:** Page III-185-186: Electricity: Consider adding a discussion under Existing Conditions on the current power crises and the proposed power plants in the valley.
- Response:** Comment noted. See response to comment # 23, above.
- H.36. Comment:** Pages III-188-189: Natural Gas: Consider adding a discussion regarding the current supply of natural gas in light of the power crises under Existing Conditions.
- Response:** Comment noted. The following is added to the last paragraph of the Existing Conditions discussion on page III-189:
- “The provision of natural gas may be affected by the electrical power shortages currently being experienced in California (please see pages III-185-188).”
- H.37. Comment:** Page III-195: Table III-41: Why are employers outside the City of La Quinta included in this table when the title indicates that they are inside the City boundary?
- Response:** Comment noted. The title of the table is hereby modified to read “Major Employers in the Eastern Coachella Valley.”
- H.38. Comment:** Page V-9: Table V-2: The Commercial Subtotals on this table and Table V-3 are different. Is there a reason?
- Response:** Yes. Table V-2 represents the land use buildout scenario for Alternative I, the More Intense Alternative. Table V-3 represents the land use buildout scenario for Alternative II, the Less Intense Alternative. These alternatives involve different land use patterns, which result in different land use acreage summaries.

I. CITY OF INDIAN WELLS

I. 1. Comment: The descriptions of the adopted land uses in the City of Indian Wells on Page No. 1-10 and III-7 are inaccurate. The area west of Fred Waring Drive adjacent to the Garden of Champions, is currently zoned for Resort Commercial uses and not Community Commercial. Please see attached exhibit.

Response: Comment noted. The statements found on page I-10, 2nd paragraph, 2nd sentence; and page III-7, 2nd paragraph, 2nd sentence are hereby revised as follows:

“Land along the northwest boundary of the General Plan planning area, south of Fred Waring Drive and adjacent to the Garden of Champions, is designated for Resort Commercial development.”

I. 2. Comment: The existing hillside areas (between Indian Wells and La Quinta) are not appropriate for the proposed Community Commercial and High Density residential Land Use designations as depicted in the Recommend Land Use Plan illustrated in Exhibit III-2. Any development within this area, as proposed, would severely impact the adjacent residential areas within the City of Indian Wells. A Hillside Overlay designated should be placed on these areas to protect the resources.

Response: Comment noted. The Community Commercial designation is applied only to the existing shopping center at the southwest corner of Washington Street and Highway 111. The Medium Density Residential designation occurs only below the toe-of-slope. The City maintains a Hillside Conservation Ordinance, which strictly regulates hillside development. As shown in Exhibit III-2, land along the La Quinta/Indian Wells boundary to the west and south of the area is question is designated as Open Space with a Hillside Overlay.

I. 3. Comment: As per our prior discussions, staff has observed Peninsular Big Horn Sheep on the hillside area adjacent to Point Happy Ranch. This information should be included in Exhibit III-22. See attached color photos dated 5/9/95.

Response: The data provided in Exhibit III-22 was taken directly from the official species mapping database of the Coachella Valley Multiple Species Habitat Conservation Plan (MSHCP). By inclusion in this Final EIR, the above-referenced sighting at that location is noted. The City recommends that the commentor send the above-referenced photos to the Bureau of Land Management or Coachella Valley Mountains

Conservancy so that these observations can be included in the MSHCP mapping database. As shown on Exhibit III-2 of the draft EIR, the Point Happy ridge is designated as Open Space with a Hillside Overlay under the Recommended Alternative land use plan.

J. GARY MITCHELL & ASSOCIATES

J.1. Comment: The proposed project represents a fundamental transformation from a low density, equestrian-oriented and agricultural-related pattern of land uses which have existing for many decades to a highly developed urban pattern of land use allowing up to 16 dwelling units per acre. The socioeconomic impacts of this project to the existing community have not been adequately addressed in this draft EIR.

Response: As shown on Exhibit III-1 and described in Table III-1, the existing La Quinta General Plan currently provides for residential densities of up to 16 dwelling units per acre. In this regard, the proposed General Plan does not represent a radical departure from the existing Plan. The proposed High Density Residential (HDR) land use designation is the only designation that allows for up to 16 dwelling units per acre. As described in Table I-2 and illustrated in Exhibit III-2, under the Recommended Alternative, this designation is applied to 282 acres, which represents only 0.5% of the entire General Plan planning area. Approximately 105 (37%) of these acres are already developed. Furthermore, the Recommended Alternative land use plan does not propose any High Density Residential land uses in the south-central or southeasterly portion of the planning area, other than those already approved by Riverside County. Instead, it restricts future residential development to a maximum of 2 dwelling units per acre or 4 units per acre, depending on location, and applies an Agricultural Overlay to allow for the continuation of existing agricultural activities at the landowner's discretion.

A detailed fiscal analysis of the potential costs and revenues associated with General Plan buildout is provided in Section III-M, Socio-Economic Resources, of the EIR. The City recognizes that the impacts associated with conversion of agricultural lands to urban development constitute a significant impact (EIR page III-28) and may not be entirely mitigatable.

J.2. Comment: Analysis of required project alternatives, (including "no project"), are ranked as having similar impact levels to various environmental resources. This statement deserves to have greater description and needs to be able to justify this blanket conclusion.

Response: Section V of the EIR contains thorough analysis of three project alternatives, including the "No Project Alternative," "More Intense Alternative," and "Less Intense Alternative." Anticipated impacts of each project are described for all environmental areas of concern

addressed for the Recommended Alternative in Section III. For each subject area, the EIR clearly describes anticipated levels of impact associated with buildout of each land use alternative, and quantifies these impacts where possible. It also compares them with the Recommended Alternative; although some anticipated impacts are expected to be “similar” to those of the Recommended Alternative, others are expected to be different, as described throughout Section V.

- J.3. Comment:** The draft EIR does not adequately assess the fiscal impacts of this project upon the community. No fiscal impact analysis has been provided that specifically addresses the direct as well as indirect fiscal costs and benefits of the proposed project. The public infrastructure investment to support the magnitude of the proposed development is enormous in comparison to the maintenance of current development intensity. If the draft EIR is correct in its projected budget shortfall of \$5.387 Million per year, then how can the “no project” alternative be dismissed as to fiscal impact analysis? Furthermore, if this fiscal assessment is accurate, then what incentive is there for the City of La Quinta to pursue the proposed development, annexation, and expanded City General Plan planning area?

Response: A detailed fiscal analysis, which describes anticipated costs and benefits associated with the proposed actions, is provided in Section III-M of the draft EIR. It is important to remember that the General Plan is a broad-reaching policy document, and General Plan buildout will occur over many years. The EIR fiscal analysis, therefore, estimates projected costs and revenues to the greatest extent possible at this time. Project-specific fiscal analyses may be required as future development is proposed. Future extensions of public services and infrastructure will be largely financed by developer impact fees, as developers are expected and required to pay their fair share of these improvements.

Buildout of the General Plan planning area, as proposed, is anticipated to result in a positive annual cashflow of approximately \$20.5 million, as shown in Table III-46. The projected shortfall of \$5.387 million cited above by the commentor represents the estimated annual shortfall of the Annexation No. 12 component of the proposed project, as described in Table III-47. An explanation of why a budgetary shortfall may occur in the proposed annexation area is provided on page III-206. While the annexation itself may result in negative annual cashflow, when rolled into the broader General Plan project, the anticipated positive fiscal impacts are considerable.

- J.4. Comment:** The noise impact analysis appears to be inadequate as to the expected growth of the Thermal Airport. The noise contours depicted in the draft

EIR appear to have been borrowed from previous studies which were prepared with the assumption that the current low-density agricultural land use pattern would be continued. The incremental increase of permitted development proposed, (up to 16 dwelling units per acre), would be expected to have more severe impacts from noise as the Thermal Airport continues its expansion and air traffic volume.

Response: The exhibit is duplicated from the airport's master plan, approved by the FAA. Future expansion of the Desert Resorts (Thermal) Airport is under the jurisdiction of the Riverside County Airport Authority. Although the City of La Quinta routinely consults and coordinates with this agency regarding general airport service to the eastern Coachella Valley, it has no direct control over airport expansion or operations. Anticipated Year 2010 noise levels associated with planned expansions at Desert Resorts Airport are described on pages 32-24 of Appendix E, and illustrated on Exhibit III-29 of the EIR. As described in Mitigation Measure L on page III-59 of the EIR, and Program 10.1 on page 40 of the General Plan, the City will continue to coordinate with the Airport Authority regarding the updating of the Desert Resorts Airport Master Plan and future expansion of airport facilities to serve the eastern Coachella Valley. The location of the noise contours will be considered in any future development proposed near the airport, however, given that the 65 dBA noise contour occurs almost entirely within the airport's boundary, future project in the area may only have to provide certain construction improvements to mitigate interior noise levels.

J.5. Comment: Loss of prime agricultural land and production area will be very substantially and negatively impacted by this project. The draft EIR does not adequately assess these impacts, nor does it provide effective environmental mitigation measures to lessen these impacts. Loss of prime, productive agricultural lands is a permanent impact with long-term implications. Agricultural soils cannot be reclaimed for future use; therefore the assessment of the preservation and enhancement of prime agricultural soils is vital to the assessment of this project and its impacts to the community.

Response: Comment noted. Section III-B of the EIR is entirely dedicated to the subject of potential impacts to agricultural lands, and it includes a detailed description of applicable agricultural land classifications and their soil and production characteristics. The City recognizes that the potential impacts associated with the conversion of agricultural land to urban development will be significant (EIR page III-28) and may not be entirely mitigatable. The Agricultural Overlay has been applied to approximately 17,615 acres of land in the south-central and southeasterly portion of the planning area to support the continuation of

existing agricultural activities at the discretion of landowners. The City shall also require a minimum 100-foot buffer between residential development and agricultural lands to minimize land use incompatibilities. A wide range of other applicable mitigation measures are described on page III-28 of the EIR, and all are expected to minimize impacts to agricultural lands and future residential development in the vicinity.

J.6. Comment: The anticipated real effects to current residents and landowners concerning the keeping of horses, raising of agricultural crops, and operation of businesses related to open space have not been assessed. There is inadequate provision made for the “grandfathering” of current land uses, structures, and investments made by the many farming businesses and others who have lived in the community for many years.

Response: The General Plan is a broad-reaching policy document, and as such, it is beyond the scope of the General Plan to identify detailed standards associated with the proposed Agricultural Overlay. Specific standards and protocols will be addressed in the City’s zoning ordinance, which includes right to farm provisions, “grandfathering” and legal non-conforming provisions, after adoption of the General Plan.

J.7. Comment: There is no environmental analysis reviewed which speaks to the issue of how a proposed development project can attain a density of up to 16 dwelling units per acre. In lieu of such development standards, the draft EIR must assume a “worst case” development scenario of 16 units per acre for the entire planning area. That analysis has not been done.

Response: The High Density Residential land use designation is the only proposed designation that permits up to 16 dwelling units per acre. As illustrated in Exhibit III-2 and described in Table III-2, the Recommended Land Use Plan assigns the High Density Residential designation to approximately 282 acres, 105 of which are already developed, and 177 of which are vacant. It does not apply this designation throughout the entire planning area, and therefore, is not required to assume a development scenario of maximum 16 units per acre for the entire planning area. The City’s Zoning Ordinance provides specific development standards and criteria for all development proposed within the City limits, as it is beyond the scope of the General Plan to do so. Site-specific development plans are subject to applicable environmental review and City approval.

J.8. Comment: Summary Matrix

The area of the proposed build-out is described as 53,498 acres. What is the proposed build-out population, in terms of dwelling units and residents?

Response: As mentioned throughout the EIR, the anticipated number of dwelling units at General Plan buildout is 78,952 (including 12,141 existing units and 66,811 potential/future units), and the anticipated buildout population is 207,970 residents (please refer to pages I-13, III-8, III-92, and all of Section III-L).

J.9. Comment: The EIR summary mentions “moderate” increases of residential and commercial uses. What is meant by “moderate”? Define in terms of maximum build-out scenarios, and relate by % to current City of La Quinta land use mix to assess the use of the term “moderate”.

Response: The Environmental Summary Matrix is intended only as a summary of existing conditions, anticipated project impacts, and mitigation measures. Detailed analysis and buildout projections are provided within the main body of the EIR. Tables III-1 and V-I provide a statistical analysis of current land use and development conditions in the General Plan planning area. Tables I-1 and I-2 provide a statistical summary of anticipated land uses at buildout of the Recommended Alternative. Further comparison of the current General Plan and Recommended Alternative is provided on pages V-2 and V-3 of the EIR.

J.10. Comment: The Summary mentions the proposed General Plan forecasts residential densities up to sixteen units per acre. How is this level of density consistent with the statement “...continue the low intensity development pattern already established in the City”?

Response: Despite the City’s predominantly low-density character, it does contain pockets of medium and high-density development. The current La Quinta General Plan Land Use Plan includes approximately 101 acres of land designated for residential densities up to 16 units per acre (HDR High Density Residential, 12-16 du/ac). The current Riverside County Comprehensive General Plan facilitates residential densities up to 15 units per acre (RH, 15 du/ac), and the County recently approved two Specific Plans (Coral Mountain and Kohl Ranch) that include medium and high-density residential development in the south-central and southeastern portions of the planning area. Please refer to Exhibit III-1 and Table III-1. The Recommended Alternative does not introduce any land use densities which exceed currently established densities within the City.

J.11. Comment: The draft General Plan forecasts 6,280 acres for “very low density residential” development, even though the planning area comprises 53,498 acres. How does the EIR base its statement that land use compatibility is assured by the General Plan?

Response: The very low-density residential acreage estimate stated in the comment is erroneous. As described in Tables I-2 and III-2 of the EIR, and Table 2.2 of the General Plan, the Recommended Alternative designates 7,089± acres for Very Low Density Residential development.

The proposed land use plan (Exhibit III-2) has been developed specifically with land use compatibility in mind and locates sensitive receptors away from noise and/or air pollution generators to the greatest extent practical. With the exception of lands included within the Agricultural Overlay, proposed residential densities and land use patterns are largely consistent with those assigned by the existing City and County General Plans. The proposed General Plan includes extensive mitigation measures which will reduce potential land use incompatibilities. Among these are the continued implementation of the City’s noise and fugitive dust ordinances, a minimum 100-foot buffer between agricultural lands and urban development, limitations on outdoor lighting, the continued use of native, drought-tolerant landscaping materials, the shielding of public utility equipment, and the continued implementation of urban design and development standards. The City shall continue to review future development proposals to assure that any potential project-specific land use incompatibilities are identified and mitigated.

J.12. Comment: Traffic/Circulation impacts are described in a separate study. What is the assumption of traffic operating levels made in that study? Is traffic level “C” being assumed? The EIR describes operating levels at level “D” currently exist in the City of La Quinta. What is being proposed to mitigate this significant adverse impact?

Response: The General Plan Update Traffic Study is included in its entirety in Appendix F of the draft EIR. Anticipated traffic and circulation impacts are addressed in both the traffic study and Section III-C of the EIR. As explained on page III-30 of the EIR, the General Plan traffic analysis designates level-of-service (LOS) “D” and/or a maximum volume to capacity ratio of 0.90 as the peak hour performance standard or design guideline for traffic volumes on the roadway system. LOS D represents high-density but stable traffic flow, with tolerable operating speeds.

The traffic study and EIR indicate that all modeled intersections in the General Plan planning area currently operate at LOS D or better. The La Quinta General Plan Traffic Model analyzed General Plan buildout traffic levels. The results indicate that all 20 intersections modeled are anticipated to operate at acceptable levels-of-service "D" or better. Of the 278 roadway segments modeled in the planning area, 263 (94.6%) are projected to operate at acceptable levels-of-service "D" or better, and 15 (5.4%) are projected to exceed typical Average Daily Trips (ADT) capacities. It is worth noting that 8 of these segments are projected to exceed capacity by only 3% or less of roadway capacity. Although a roadway segment may be identified as exceeding the allowable capacity, intersection improvements may allow the endpoints of a segment to operate acceptably.

The General Plan and draft EIR identify numerous programs and mitigation measures that will reduce these potential impacts to acceptable levels. Among these are implementation of the intersection geometries provided in Exhibit III-14 and cross-sections described in Exhibit III-12, development of a municipal master plan or roads, maintenance of a balanced mix of housing and employment opportunities, and promotion of non-motorized transit.

J.13. Comment: The traffic/circulation section makes no mention of comprehensive multipurpose trails or related circulation improvements other than a golf cart route system. How can the proposed development be consistent with the environmental character of the area without a trails system linking equestrian and jogging areas with other areas located in the City and in adjacent areas, i.e. polo club area?

Response: The General Plan and EIR are clearly responsive to the need for a comprehensive multi-use trail system, which facilitates pedestrian, bicycle, equestrian, and other non-motorized traffic. A proposed multi-purpose trail system is illustrated on Exhibit 3.10 of the General Plan. Please also see the following references: 1) Mitigation Measure G on page III-159 of the EIR, 2) Policy 7 and its programs on pages 39 and 40 of the General Plan, 3) Policy 4 and its programs on pages 47 and 48 of the General Plan, and 4) Policy 6 and its programs on pages 43 and 44 of the General Plan, all of which address the need for a coordinated, multi-purpose trails system.

J.14. Comment: The EIR states that "...Less Intensive Alternatives would result in all intersections operating at Level of Service D or better. What is the justification for this conclusion? The EIR seems to suggest that only the intensive development scenario will improve this circulation system. Why wouldn't a lower level of dwelling units and population require a

lower level of traffic and circulation improvements? The Indio General Plan, whose planning area is contiguous to the proposed project area, assumes level “C” for traffic improvements. Has the draft EIR analyzed the inconsistency between the proposed project and the existing adopted land use plan of a neighboring city?

Response: The General Plan Traffic Study is included in its entirety in Appendix F of the EIR. The study, in conjunction with the summary provided in Section III-C of the EIR, provides a complete explanation of the conclusions reached by the traffic engineer, and incorporated into both the General Plan and EIR.

The impacts associated with the recommended alternative, as well as three other alternatives, are fully analysed in the EIR. Section V of the EIR identifies impacts associated with all alternatives relating to traffic generation, including most significantly for the commentor’s comment, Table V-4, Comparison of Intersection Impacts For Each Project Alternative. This Table, and the associated text, demonstrates that the Low Density Alternative generates 14% fewer trips than the recommended alternative.

The standards and policies of surrounding jurisdictions have been incorporated into all modeling efforts for transportation facilities within the City.

J.15. Comment: Soils & Geology. The EIR concludes that “...build-out of the General Plan is not expected to significantly increase risks associated with groundshaking and other seismically induced hazards...” What is the evidence analyzed that would support this conclusion?

Response: Please refer to the “Technical Background Report for the Safety Element for the City of La Quinta” (Appendix G) and Section III-D of the EIR, both of which provide extensive discussions of potential geologic and seismic hazards in the planning area, and offer numerous mitigation measures which will reduce these risks to acceptable levels. A reference list of more than 130 sources analyzed to reach these conclusions is provided in Appendix A of the Technical Background Report for the Safety Element.

J.16. Comment: Visual Impacts. What development standards does either the proposed General Plan or draft EIR provide to ensure the preservation of the unique and valuable visual resources of the Santa Rosa Mountains and viewshed?

Response: The General Plan and EIR propose numerous policies and programs designed to mitigate potential adverse impacts to valuable regional viewsheds. The Mitigation Measures provided on pages III-163 and III-164 address outdoor lighting, undergrounding of utilities, appropriate landscaping materials, design and screening of utility equipment, and signage. The General Plan Land Use Plan designates the Santa Rosa and Coral Reef Mountains as Open Space with a Hillside Overlay. General Plan Policies 13, 14, and 15, and their corresponding programs, establish primary, secondary, and agrarian Image Corridors throughout the planning area. Site-specific setbacks, height restrictions, and architectural regulations are addressed in the City's zoning ordinance, as it is beyond the scope of the General Plan to do so.

J.17. Comment: Ground surface disruption will result in substantial wind erosion and related environmental damage to the community. What mitigating measures are proposed to alleviate this unavoidable impact?

Response: The General Plan and EIR propose a wide range of policies, programs, and mitigation measures which reduce wind erosion hazards. Mitigation Measure G on page III-75 of the EIR requires that all grading permit requests include a soil erosion prevention plan, which includes a variety of fugitive dust control measures to be implemented before, during, and after development. Mitigation Measure E on page III-142 of the EIR encourages the phasing of development projects to reduce construction-related emissions, and requires the use of water trucks, temporary irrigation systems, and other measures which limit fugitive dust emissions resulting from site disturbance. According to Mitigation Measure M on page III-142, the City shall support the air quality control measures identified in the Coachella Valley PM10 State Implementation Plan. Mitigation Measures O and Q (page III-142 and III-143) describe specific dust control management controls that may be submitted with development proposals. Per Program 6.2 of the General Plan, the City shall continue to maintain and enforce its Fugitive Dust Control Ordinance. Please also see Programs 6.4 and 7.2 on page 51 of the General Plan.

J.18. Comment: Hydrology. The EIR states that conversion of low density agricultural land to urban development could result in increased run-off. What analysis has been performed that contrasts the project alternatives? The EIR consistently states that "only the Recommended Alternative" would result in acceptable environmental risks, and that impacts of other alternatives would result in the same levels of impact. How is this conclusion supported by a reasonable alternative comparative analysis?

Response: Section V of the EIR evaluates the same range of environmental issues for three project alternatives that were evaluated for the Recommended Alternative in Section III. It compares and contrasts the anticipated impacts associated with buildout of each project alternative. A comparison of the anticipated hydrologic impacts associated with each project alternative is provided on page V-19. Since all development results in increases in impermeable surfaces, the No Project is the least impacting to hydrological resources. The next least impacting would be the Less Intense Alternative, which results in fewer buildings, and therefore fewer impermeable areas.

The commentor's suggestion that the "EIR consistently states that 'only the Recommended Alternative' would result in acceptable environmental risks, or that impacts of other alternatives would result in the same levels of impact" is entirely unsubstantiated. In fact, on pages V-13 and V-15, the EIR indicates that the No Project and Less Intense Alternatives will result in moderately reduced levels of future development than the Recommended Alternative. On pages V-16 and V-17, the EIR indicates that buildout of the No Project and Less Intense Alternatives will result in fewer trips generated and overall better levels-of-service than the Recommended Alternative. On page V-19, the EIR states that "none of the four alternatives is expected to have any significant effect or advantage with regard to the efficacy of these [hydrology] facilities." On page V-20, the EIR states that "from a water consumption perspective, the No Project Alternative is the superior project alternative, closely followed by the Less Intense Alternative." On page V-23, the EIR states that "the No Project Alternative is expected to generate the least [air quality] pollutants, closely followed by the Less Intense Alternative." On page V-30, the EIR states that the No Project and Less Intense Alternatives "appear to be the favorable project alternatives in that they will place the fewest demands on local schools." Numerous other examples of objective comparisons between the four project alternatives can be found throughout Section V of the EIR.

J.19. Comment: Biological Resources. The EIR states that the low-density development (up to 16 dwelling units per acre) pattern proposed by the General Plan is not expected to result in adverse impacts to existing biological resources. What is the justification of this conclusion?

Response: As shown in Tables I-2 and III-2, the General Plan facilitates the development of up to 16 dwelling units per acre on only 282 acres (0.5%) of the planning area. In fact, the majority of residential lands (22,705 acres or 42.4% of the planning area) are designated for Low Density development of up to 4 units per acre.

Although buildout of the proposed General Plan may adversely impact biological species, these impacts can be adequately mitigated and are not expected to be significant. Implementation of the mitigation measures identified in the “La Quinta General Plan Update Biological Assessment” (Appendix C of the EIR) and Section III-G of the EIR, and the policies and programs described on pages 62 and 63 of the General Plan, will reduce potential impacts to acceptable levels.

J.20. Comment: Cultural Resources. The EIR mentions several mitigating measures by suggesting that the City might consider adopting historic standards and other non-existing policies relating to preservation of cultural resources. How can these mitigation actions be effective if they are not adopted prior to development?

Response: As explained on page III-121, the City has already adopted a Historic Preservation Ordinance and established a Historic Preservation Commission, which is responsible for the review of proposed development as it relates to the historic preservation of the community. Additionally, the City has already prepared a historic resources inventory, which is provided in Appendix B of the EIR. The mitigation measures described on pages III-123 and III-124 are prescriptive and *require* the City to take additional actions to preserve and enhance valuable cultural resources. For example, all development projects involving discretionary city action *shall be* reviewed by a qualified archaeologist, historian, or other approved professional in order to identify potential impacts to historical resources and appropriate, site-specific mitigation measures. A qualified archaeologist and/or Native American representative *shall* provide on-site monitoring during ground-disturbing activities. The City *shall* strictly enforce building codes to prevent deterioration of historic buildings and districts, and *shall* develop and implement a public awareness program regarding local heritage.

J.21. Comment: Noise Impacts. The noise estimates for the Thermal Airport development scenario appear to reflect the continuation of historic land use patterns. Has the draft EIR adequately taken into account the proposed urban development scenario as analyzed from noise impacts as are expected at the Thermal Airport continues to grow and experience greater air traffic volumes?

Response: Please see response to comment #J.4, above.

J.22. Comment: Fiscal Impacts. How have the fiscal impacts been addressed without the preparation of a new fiscal impact analysis? The public infrastructure improvements required by this magnitude of development will require

substantial investment from both the public and private sectors. The fiscal impacts of this need to be specifically addressed to the “worst-case” development scenario, up to 16 dwelling units per acre. If the draft EIR is accurate in its estimate of an estimated fiscal budget shortfall of \$5 Million for the provision public services to support the required level of infrastructure improvements, then how can the EIR dismiss the “no project” alternative?

Response: A fiscal analysis for the Recommended Alternative is provided in Section III-M of the draft EIR, and fiscal analyses for the other three project alternatives are provided in Section V. While a portion of public infrastructure improvements required to serve future development will be funded by public sources, a substantial percentage will be funded by developer impact fees, as developers are expected and required to pay their fair share of such facilities.

The proposed General Plan facilitates the development of up to 16 dwelling units per acre on only 282 acres (0.5%) of the planning area. The remaining 32,669 acres of residential land are designated for lower densities, ranging from 0 to 12 units per acre. The fiscal analyses in the EIR analyze anticipated costs and benefits associated with buildout of each project alternative. It is worth noting that the General Plan is a long-range policy document, and is only capable of providing fiscal projections at this time. Actual revenues and costs will depend upon future levels of development, and the City may require that project-specific fiscal analyses be prepared as development is proposed.

As previously explained in the response to Comment #J.3, above, buildout of the proposed General Plan is anticipated to result in a positive annual cash flow of approximately \$20.5 million, as shown in Table III-46. The projected shortfall of \$5 million cited by the commentor represents the estimated annual shortfall of the Annexation No. 12 component of the proposed project (Table III-47). An explanation of why a budgetary shortfall may occur in the proposed annexation area is provided on page III-206. While the annexation itself may result in negative annual cashflow, when rolled into the broader General Plan project, the anticipated positive fiscal impacts are considerable.

J.23. Comment: Agricultural Resources. The Coachella Valley is world-recognized as a leading agricultural production area. Why have existing valuable agricultural soils and production lands not been adequately identified by mapping or other means by this draft EIR?

Response: Section III-B of the EIR is entirely dedicated to the subject of agricultural lands. A detailed description of existing agricultural land classifications, soil characteristics, production suitability, and corresponding acreage estimates for the planning area is provided on pages III-22 and III-23. The provisions of the Williamson Act are also explained, and the number of acres subject to Williamson Act contracts within the planning area is provided.

J.24. Comment: Biological Resources. The draft EIR references the preparation of the Coachella Valley Multiple Species Habitat Conservation Plan (CV MSHCH). Has a separate biological assessment, including field assessment, habitat survey, and field observation been performed for this environmental study? Since this work is currently being undertaken by the public agencies identified, how can the project impacts to existing biologic resources be adequately assessed until the CV MSHH has been adopted?

Response: The La Quinta General Plan Update Biological Assessment was prepared on June 1, 2001 and is printed in its entirety in Appendix C of the draft EIR.

The Coachella Valley Multiple Species Habitat Conservation Plan (MSHCP) has not been completed or adopted by the Coachella Valley Association of Governments (CVAG) or its member jurisdictions. The City of La Quinta is a signatory to the MOU for the preparation of the Plan and has cooperated and participated in its preparation. Upon completion of the Plan, the City shall carefully consider its adoption and implementation.

J.25. Comment: Water Quality/Resources. The EIR needs to state the comparative demand for water resources and concomitant adverse environmental impacts to be related to the Project Alternatives in a more comprehensive manner.

- What is the impact of the project to the contamination of the Salton Sea drainage area?
- Has the EIR taken into account the recent groundwater recharge program utilizing “tiling” for the lower Thermal water sub basin? What are the impacts of the continued use of this water management system to the proposed project?
- How does the draft EIR analyze the expected impacts of the wastewater effluent to be generated by the project as to existing and future groundwater quality and quantity?

Response: The EIR addresses potential impacts to water quality in Section III-F. The EIR and General Plan include numerous policies, programs, and

mitigation measures designed to reduce potential impacts to acceptable levels. The City's commitment to connecting all future development to a community-wide sewer system is one of the most important mechanisms to reduce future groundwater contamination generated by urban development. The City shall also require the construction of on-site retention/detention basins to enhance filtration of urban runoff and groundwater recharge. The City will continue to work closely with the Coachella Valley Water District (CVWD) to assure that adequate wastewater collection and treatment facilities are maintained and sufficiently treated to meet the standards of the California Regional Water Quality Control Board and other regulatory agencies. The City will continue to support and promote groundwater recharge efforts in the Coachella Valley, as well as the use of recycled and tertiary-treated water. All development proposals shall be reviewed on a case-by-case basis for their potential to create surface and groundwater contamination hazards from point and non-point sources.

It is worth noting that the application of fertilizers, pesticides, and other chemical agents to agricultural land is known to be one of the primary contributors to long-term groundwater quality degradation in the Coachella Valley. According to CVWD's "Coachella Valley Water Management Plan" (draft, November 2000, Table 3-8), in 1999, the total amount of salt added to the groundwater basin from the Lower Coachella Valley (which includes General Plan planning area) was 356,000 tons per year. This is about 74% more than was added from the Upper Coachella Valley (91,000 tons per year), and is largely associated with agricultural activity, which predominates in the Lower Valley. Of this, approximately 251,000 tons of salt were contributed by canal water imported for agricultural irrigation, and 16,000 tons were contributed by fertilizers. Only 7,000 tons were contributed by domestic uses. Although agricultural drains generally prevent approximately 2.8 tons of salt per acre-foot from percolating into the aquifer, 25 of these drains empty directly into the Salton Sea (CVWD, p. 3-29), further contributing to regional water quality degradation. Implementation of the General Plan programs and mitigation measures described above can be expected to contribute to overall improvements in surface and ground water quality.

K. BUILDING INDUSTRY ASSOCIATION

K.1. Comment: Page M-10 and other sections in the document: You appear to consider data only through 1998 and do not take into consideration that the valley is presently in a serious non-attainment status and in danger of being reclassified as a serious non-attainment area. There is no reference to increased requirements for dust control and more specific dust control plans.

Response: Comment noted. Table III-18 is hereby amended, as shown on the following page, to include PM₁₀ emissions data for 1999 and 2000.

Additionally, the following paragraph will replace the 3rd paragraph on page III-128 of the EIR, in order to provide the most accurate, up-to-date portrayal of the PM₁₀ non-attainment situation in the Coachella Valley.

“Although the Coachella Valley achieved the federal PM₁₀ standard for several years in the mid-1990s, it was unable to achieve the annual average standard for a sufficient, extended period of time. The region continues to be designated a “serious” non-attainment area for PM₁₀, with grading and construction activity representing the most significant source of fugitive dust emissions. In an effort to remedy this situation, the SCAQMD and CVAG jointly developed “Guidelines for Dust Control Plan Review for Coachella Valley Jurisdictions” in November 2000. The guidelines are intended to supplement local dust control ordinances and assist local government staff in reviewing dust control plans submitted for construction projects in the valley. In addition, SCAQMD employs a Coachella Valley PM₁₀ Air Quality Inspector, who advises and coordinates with developers and city staff regarding site-specific methods of reducing local PM₁₀ emissions. Each city in the valley has appointed a staff member as the city’s “PM₁₀ dust czar,” who serves as a single point of contact for local PM₁₀ issues. Should the region continue to fall short of federal PM₁₀ standards, the U.S. EPA could impose more stringent regulations or sanctions.”

Table III-18
Coachella Valley Air Quality Trends
Exceedances of PM₁₀ Standards

Monitoring Station	Year	Maximum Concentration ($\mu\text{g}/\text{m}^3/24\text{hours}$)	No. (%) Samples Exceeding 24-hr. Standards		Annual Average ($\mu\text{g}/\text{m}^3$)	
			Federal ¹	State ²	AAM ³	AGM ⁴
Palm Springs	1990	83	0 (0.0%)	9 (15.3%)	34.5	30.5
	1991	197	1 (1.8%)	14 (25.0%)	42.9	36.6
	1992	175	1 (1.7%)	4 (6.7%)	29.6	24.3
	1993	58	0 (0.0%)	1 (1.7%)	27.0	23.6
	1994	97	0 (0.0%)	23 (38.3%)	48.7	45.3
	1995 [^]	199	1 (1.6%)	27 (44.3%)	52.0	47.2
	1996	130	0 (0.0%)	2 (3.3%)	29.3	25.2
	1997 ^{a)}	63	0 (0.0%)	1 (1.8%)	26.4	23.6
	1998	72	0 (0.0%)	3 (5.2%)	26.4	23.8
	1999	104	0 (0.0%)	3 (5.0%)	28.8	26.1
	2000	44	0(0.0%)	0(0.0%)	24.4	22.7
Indio	1990	520	4 (6.8%)	41 (69.5%)	79.3	64.9
	1991	340	3 (5.1%)	37 (62.7%)	69.0	59.8
	1992	117	0 (0.0%)	18 (30.5%)	43.4	39.2
	1993	125	0 (0.0%)	25 (41.0%)	46.4	40.6
	1994	97	0 (0.0%)	23 (38.3%)	48.7	45.3
	1995 [^]	199	1 (1.6%)	27 (44.3%)	52.0	47.2
	1996*	117	0 (0.0%)	29 (50.0%)	50.8	46.1
	1997 ^{a)} *	144	0 (0.0%)	23 (42.6%)	49.1	44.2
	1998	114	0 (0.0%)	32 (40.0%)	48.1	43.8
	1999	119	0 (0.0%)	30 (54.0%)	52.7	49.8
	2000*	114	0(0.0%)	52(50.0%)	51.9	48.4

¹ = > 150 $\mu\text{g}/\text{m}^3$ in 24 hour period

² = > 50 $\mu\text{g}/\text{m}^3$ in 24 hour period

³ Federal Annual Average Standard = AAM > 50 $\mu\text{g}/\text{m}^3$

⁴ State Annual Average Standard = AGM > 30 $\mu\text{g}/\text{m}^3$

[^] Includes high-wind natural event days

^{a)} Less than 12 full months of data; may not be representative.

* Data for samples collected on high-wind days were excluded in accordance with EPA's Natural Events Policy.

Source: Annual air quality site monitoring reports, prepared by South Coast Air Quality Management District.

K.2. Comment: Page III-115: Paragraph “K” is badly worded in that it would require a “barrier” around the entire site, not just that portion that “borders” the hillsides. It would require a “barrier” only if the sheep are “demonstrated to occur on the project site” not on the adjacent hillside. What is the reason for the informal consultation? To provide the basis for need? Fence design?

Response: Comment noted. Mitigation Measure “K” on page III-115 is hereby amended as follows:

“To reduce the impacts of urbanization on bighorn sheep, the City shall consider requiring barriers between future development projects and the adjacent hillside if bighorn sheep are demonstrated to occur on the subject property or adjacent hillside. Informal consultation and/or review by the U.S. Fish and Wildlife Service and California Department of Fish and Game shall be completed prior to construction of any barrier, so as to assure appropriate, safe, and effective barrier design.”

**L. U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT**

L.1. Comment: We ask that the plan identify BLM-managed public lands within the City limits as being under the jurisdiction of the BLM and to acknowledge the management responsibilities of the BLM on these lands under Federal Land Policy Management Act of 1976, wilderness designations under the California Desert Protection Act of 1994, and the Santa Rosa and San Jacinto Mountains National Monument Act of 2000. (Page I-3, I-9, II-9, III-7, III-12, III-10, exhibit I-3, Map 2 within Appendix C, Biological Report).

Response: Comment noted. The following exhibit, which illustrates BLM-managed lands in the General Plan planning area, is hereby incorporated into the Existing Conditions portion of Section III-A (Land Use Compatibility) of the draft EIR.

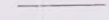
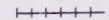
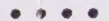
In addition, the following paragraph is added to the Surrounding Land Use discussions on pages I-10 and III-7:

“A substantial portion of public land within the Santa Rosa and Coral Reef Mountains adjacent to the General Plan planning area is managed by the U.S. Bureau of Land Management (BLM) (please see Exhibit III-?). BLM’s land management responsibilities are authorized by several federal land management policies, including the Federal Land Policy and Management Act of 1976, which established general policies for the management, protection, development, and enhancement of public lands in the United States. Under the California Desert Protection Act of 1994, certain lands in BLM’s California Desert Conservation Area, including the Santa Rosa Mountains, were designated as “wilderness” areas. This designation assures the highest level of preservation and protection from development and human disturbance and is directed at preserving the primitive and undisturbed character of designated lands. The Santa Rosa and San Jacinto Mountains National Monument Act of 2000 designated more than 272,000 acres of land in the Santa Rosa and San Jacinto Mountains as a national monument. This designation demonstrates the value of the mountains, as recognized by Congress, and provides further protection of these unique lands for biological, cultural, recreational, educational, and scientific purposes. The Monument provides extensive habitat for more than 500 plant and animal species, including a number of special-status species, such as the Peninsular bighorn sheep, desert tortoise, Southern yellow bat, and Least Bell’s vireo.”

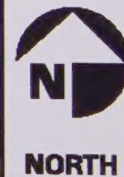
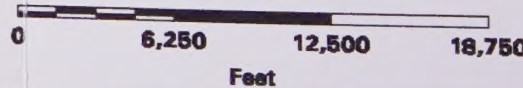


City of La Quinta General Plan

LEGEND

-  Bureau of Land Management Owned Lands
-  Roads
-  Township/Range Sections
-  Railroads
-  City Limits
-  General Plan Planning Area
-  City Sphere of Influence

Scale
1:90,000



Riverside County Vicinity Map



Map Prepared on: October 18, 2001
Map Prepared by: Aerial Information Systems
Map Version No.: 5



L.2. Comment: The city's Hillside Ordinance protects the mountains "above the toe-of-slopes", page VIII-5, which means the alluvial fans would be developed. We suggest that this be considered as an impact to bighorn sheep and as a cumulative impact throughout the Coachella Valley.

Response: The General Plan planning area contains two undeveloped alluvial fans: one at Bear Creek and one adjacent to the Travertine site. As illustrated in Exhibit III-2, the Recommended Alternative land use plan designates the Bear Creek alluvial fan as Open Space, which precludes opportunities for future urban development (as described on page I-18). The Travertine site occurs adjacent to, but outside of the Peninsular Bighorn Sheep Critical Habitat boundary. In addition, the Travertine project is an approved Specific Plan.

L.3. Comment: On page III-101, third paragraph, the document states "Projects receiving federal funding will be required to initiate consultation with the USFWS to determine if the proposed activities will adversely modify (bighorn sheep) Critical Habitat." It is our understanding that all projects affecting critical habitat, regardless of the funding source, require consultation with the U.S. Fish and Wildlife Service.

Response: According to the U.S. Fish and Wildlife Service (as described in Federal Register, Vol. 66, No. 22, February 1, 2001, 50 CFR, Part 17), "critical habitat receives protection under section 7 of the [Endangered Species] Act through the prohibition against destruction or adverse modification of critical habitat with regard to actions carried out, funded, or authorized by a Federal agency. Section 7 also requires consultation on Federal actions that are likely to result in the destruction or adverse modification of critical habitat... Because consultation under section 7 of the Act does not apply to activities on private or other non-Federal lands that do not involve a federal nexus, critical habitat designation would not afford any additional protections under the Act against such activities."

In light of the above-referenced statements, the last sentence of the third paragraph on page III-101 is hereby amended as follows:

"All projects with a federal nexus, including actions carried out, funded, or authorized by a Federal agency, shall be required to initiate consultation with the USFWS to determine if the proposed activities will adversely modify Critical Habitat."

L.4. Comment: In addition, we recommend the addition of bighorn sheep to page IV-3, second paragraph.

Response: The second paragraph on page IV-3 addresses unavoidable significant impacts as they relate to traffic and circulation in the General Plan planning area and does not refer to biological species or habitat preservation.

L.5. Comment: We recommend a feral cat control program and dog leash requirements within the Santa Rosa and San Jacinto Mountains Monument to discourage pets from preying on wildlife at the wildland-urban interface and other areas (page III-114).

Response: The Santa Rosa and San Jacinto Mountains Monument are under the jurisdiction of several public and quasi-public agencies, including the Bureau of Land Management, U.S. Forest Service, and California Department of Fish and Game. While the City supports the implementation of the above-referenced animal control programs, it has no purview to regulate activities on these lands. The City enforces a leash law and operates an animal control program within its boundaries, both of which will help control animals within the City limits.

M. U.S. FISH AND WILDLIFE SERVICE AND CALIFORNIA DEPARTMENT OF FISH AND GAME

M.1. Comment: The U.S. Fish and Wildlife Service (Service) and the California Department of Fish and Game (Department) have reviewed the subject document. We provide these comments based on our respective administration of the Endangered Species Act of 1973, as amended (ESA) and the California Endangered Species Act (CESA). Take of listed species is prohibited under section 9 of the ESA and 2080 of the CESA but can be authorized under sections 7 (Federal consultation) and 10 (incidental take and recovery permits) of the ESA, and sections 2080.1, 2081 and 2835 of the CESA.

Response: Comment noted.

M.2. Comment: The General Plan area contains a unique assemblage of wildlife plants, including many declining, endemic, and listed species. For desert floor species dependant [sic] upon sandy habitats on the desert floor, the Coachella Valley Fringe-toed Lizard Habitat Conservation Plan and CVAG's multispecies (sic) planning effort are primarily focusing on bioregional strategies that would conserve larger blocks of intact habitat in other jurisdictions outside the City of La Quinta. These planning efforts do not include habitat conservation objectives within the City because remaining patches of sandy habitats are becoming too small and isolated for species to survive over the long-term. As such, the plans have and are identifying mechanisms for the City to participate by offsetting the adverse effects of implementing its General Plan by collecting fees to acquire offsite habitats in other areas that have higher probabilities for species' long-term survival.

Response: Comment noted.

M.3. Comment: We support the City's proposed adoption of policies that would require surveys for projects that may adversely affect the various species proposed for conservation coverage under CVAG's multispecies (sic) planning effort. Though most of these sensitive species are not currently afforded State of Federal protection, most are endemic to the Coachella Valley and have declined significantly in their distribution and abundance, primarily from habitat loss and degradation. For example, the geographic extent of species dependant [sic] upon active sandy habitats have declined historically by over 95 percent in recent decades. The biological information compiled and analyzed by CVAG's multispecies (sic) planning program documents current threats and the status of these species relative to their modeled historical distribution. The multispecies (sic) program is treating these species as though they

were listed by the State or Federal governments and is, therefore, formulating conservation strategies based on the premise that they warrant protection. Therefore, we recommend that the City adopt a policy to consider those plants and animals that occur within the City and are proposed for conservation coverage under CVAG's multispecies (sic) planning program to be endangered, rare, or threatened species, pursuant to section 15380(d) of the CEQA Guidelines. This would provide the City a more effective mechanism to offset the most severe biological effects of implementing its General Plan and also help assemble a regional habitat reserve system in the Coachella Valley before those opportunities are foreclosed elsewhere.

Response: Comment noted. Both the proposed General Plan and its EIR are responsive to the protection and conservation needs of sensitive plant and animal species occurring within the planning area. It should be kept in mind that the General Plan EIR is a programmatic document and, in conjunction with the policies and programs set forth in the General Plan, provides broader directives than project-specific regulatory documents.

The City is a member of the Coachella Valley Association of Governments (CVAG) and is signatory to the Memorandum of Understanding (MOU) for the Coachella Valley Multiple Species Habitat Conservation Plan (MSHCP). The General Plan EIR directs the City to continue to participate in the development of the MSHCP. Until such time as the MSHCP is completed and adopted, City staff shall continue to review development proposals on a case-by-case basis to assure that appropriate and effective mitigation measures are established, in compliance with all applicable laws, to protect plant and animal species.

Other General Plan policies and programs, which direct City conservation efforts, include Policy 2 and its programs (General Plan, page 62), which address the need for focused species surveys, and Policy 4 and its programs (General Plan, page 62), which require that unique and/or valuable biological resources be preserved as Open Space. The EIR also directs the City to establish a system of multi-use corridors for wildlife interconnection between open spaces, provide an effective buffer between urban development and sensitive wildlife lands, and preclude the use of non-native, invasive vegetation.

M.4. Comment: We generally concur with the intent of the draft goals, policies, and programs to conserve biological resources in the draft Comprehensive General Plan (pp. 62-63). However, in many cases, these biological objectives likely will not be realized, given the stated language caveats (e.g., "to the greatest extent practical" and "shall consider requiring")

and several zoning contradictions. For example, despite the stated goals expressed in Policy 4, Program 4.1, and Policy 5 (pages 62-63 of the draft Comprehensive General Plan), the proposed zoning/land uses fail to provide for conservation of unique and/or valuable biological resources in several important areas, protection of the Peninsular bighorn sheep, and buffering of sensitive habitats from urban development (see discussion below for more details). The draft EIR briefly discusses the effects of habitat loss of bighorn sheep but does not analyze how the proposed mitigation measures would ameliorate significant impacts. The offered mitigation measures (policies on open space and hillside development) should be analyzed relative to recommended conservation program in the Recovery Plan for Bighorn Sheep in the Peninsular Ranges, California (USFWS 2000). The disparity between implementation of the draft Comprehensive General Plan and the conservation objectives in the Recovery Plan indicate that conflicts with bighorn sheep would be significant and likely would preclude achievement of the recovery objectives for the ewe group in question (see discussion below).

Response: Both the General Plan and draft EIR are responsive to the need to preserve and protect bighorn sheep habitat. Among these are Mitigation Item A (EIR, page III-114), which requires the City to designate all areas above the toe of slope of the Santa Rosa and Coral Reef Mountains as Open Space, and Mitigation Item K (EIR, page III-115), which is consistent with the Recovery Plan's description of project-specific fencing to help mitigate the adverse effects of adjoining land uses. Critical Habitat boundaries, as established by the U.S. Fish and Wildlife Service, are illustrated on Exhibit III-22. Projects with a federal nexus shall be required to initiate consultation with the USFWS to determine if the proposed activities will adversely modify Critical Habitat. In this regard, no disparity between the General Plan and Recovery Plan is anticipated.

M.5. Comment: Water courses and alluvial fans in the planning area support Desert Dry Wash Woodlands, which represent a rare plant community recognized by the State. This plant community is comprised of several species that are protected under the California Desert Native Plants Act Division 23 of the Food and Agricultural Code (Fish and Game Code Sec. 1925). These desert woodland habitats support a greater diversity and abundance of wildlife than other desert habitat types (England 1984). In addition, these areas also provide critical and essential habitat for the endangered peninsular bighorn sheep.

The Department encourages the conservation of these watercourses and opposes their elimination, channelization, or conversion to subsurface

drains. All wetlands and watercourses, whether intermittent or perennial, must be retained with substantial setbacks that preserve riparian and aquatic values and maintain their value to on-site and off-site wildlife populations. The fluvial channels on alluvial fans are considered regulated water courses.

Response: The General Plan is a long-range and broad-reaching policy document, which is responsive to the need to protect sensitive habitat in the planning area. The Recommended Alternative land use plan designates 602± acres of floodways and drainage channels as Open Space/Watercourse (W). Not only does this designation protect the population and structures from flooding hazards, it also preserves and enhances the value of riparian habitat in the planning area. General Plan Policy 6 (page 87) requires major drainage facilities to provide for the enhancement of wildlife habitat, to the greatest extent possible, while still maintaining their functional qualities.

The planning area contains two undeveloped alluvial fans: 1) Bear Creek, and 2) one adjacent to the Travertine site. As shown on Exhibit III-2, the Recommended Alternative land use plan designates the upper Bear Creek Channel system as Open Space/Watercourse and surrounding land as Open Space. These designations preclude future development within and adjacent to the channel. Similarly, the Dry Wash Woodland community adjacent to the Travertine site is designated as Open Space/Watercourse. The Travertine Specific Plan was reviewed under an Environmental Impact Report certified by the City Council, and which included a requirement for a habitat conservation plan to be submitted to CDFG prior to development. Future development projects involving a streambed alteration or other impact to fluvial channels, are required to obtain the necessary permits (i.e. 1603 or 404 permits) from the appropriate regulatory agency.

M.6. Comment: The Department has authority under Fish and Game Code § 1600 *et seq.*, regarding any proposed activity that would divert, obstruct, or affect the natural flow or change the bed, channel, or bank of any water course or body of water. A discussion of potential impacts from any filling, grading, increased runoff, sedimentation, soil erosion, and/or pollutants on water bodies on or near project sites, with mitigation measures to alleviate such impacts, must be provided to meet permit issuance criteria. We, therefore, recommend that the City adopt a policy that would complement this trust responsibility of the State.

Response: Comment noted. The following mitigation measure is hereby added to page III-86 (Hydrology) of the EIR:

“In accordance with California Department of Fish and Game Code § 1600 *et seq.*, any proposed development which may divert, obstruct, or affect the natural flow or change the bed, channel, or bank of any water course or body of water shall be required to obtain a permit and/or other appropriate authorization from the California Department of Fish and Game prior to development. Other approvals may also be required from the U.S. Army Corps of Engineers, Regional Water Quality Control Board, and other regulatory agencies.”

M.7. Comment:

Page III, 112-113. The section on “Potential Impacts to Mammals” does not adequately address the cumulative effects of building-out the proposed General Plan. The extent of urban development contemplated in the Travertine specific plan and up to 4 units per acre (low density residential zoning) in the adjoining section 5 would eliminate many hundreds of acres of bighorn sheep habitat and introduce high levels of human disturbance into remote and sensitive areas that currently support a stable bighorn sheep population. Zoning at up to 4 units per acre in designated critical habitat conflicts with Biological Resources Policy 5 by not providing for a biologically appropriate transition of buffer between urban land uses and mountainous/alluvial bighorn sheep habitat. To address this conflict, we recommend that the City identify strategies, such as more biologically appropriate zoning, and a habitat acquisition program, for conserving these and other private lands in bighorn sheep habitat that are vulnerable to and zoned for future development.

Response:

Comment noted. The Travertine Specific Plan is a City-approved Specific Plan which was reviewed under a certified EIR. The EIR includes a mitigation measure requiring the preparation of a habitat conservation plan to be submitted to CDFG prior to development.

As shown in Exhibit III-1, approximately 75% of the land in Section 5, adjacent to the Travertine Specific Plan, is currently designated for low-density residential development (2-4 du/ac) under the existing General Plan. The Recommended Alternative land use plan, shown in Exhibit III-2, provides for the continuation of this existing land use designation.

Through its development review process, the City shall continue to evaluate proposed projects for their potential to adversely impact sensitive biological species and habitat. The City supports the acquisition of land in bighorn sheep habitat by public land trusts and other agencies capable of managing these lands effectively. Please also see response to Comment #8, below.

M.8. Comment: As described in the Recovery Plan, alluvial fans provide important foraging habitat for bighorn sheep, and the numerous canyons draining into the Travertine fan provide important perennial water sources along their lower reaches, as well as lambing and rearing habitat. Increased levels of human recreation, including the focused attraction of humans to desert water sources and oases by the many thousands of new residents supported by the planned urban developments (in the alluvial fan in question and throughout the General Plan area at large), likely would be sufficient to displace future bighorn sheep use of Guadalupe, Devil, and Bear canyons, which are critical to maintaining a stable population in the local ewe group. Please refer to the numerous citations in the Recovery Plan that document the adverse behavioral reactions of sheep to human disturbance. Given the inability to replace the functional loss of these scarce, yet critical foraging, watering, lambing, and rearing habitats, the proposed General Plan would reduce the size of the remaining home range of this ewe group, and consequently reduce the capability of the diminished home range to sustain future populations at current levels. Such a population destabilization and associated decline would constitute a significant adverse effect resulting from implementation of the proposed General Plan.

Response: Comment noted. While gradual increases in human recreational activity can be expected over the life of the General Plan, recreational access to wildlands will not be uncontrolled. The public and quasi-public agencies that manage the Santa Rosa and San Jacinto Mountains National Monument, in which Guadalupe, Devil, and Bear canyons are located, will continue to monitor and control trail access through designated bighorn habitat, and the public will be permitted only on trails which are open for use. The City will continue to participate and cooperate in the BLM's trails planning effort currently underway, which involves the trails component of the California Desert Conservation Area (CDCA) Plan and addresses trails crossing through bighorn habitat.

M.9. Comment: Similarly, the recreational and other potential land uses designated for sections 13 and 24, immediately south of La Quinta Cove, have the potential to disrupt bighorn habitat use patterns in surrounding areas. For example, the mountainous peninsula bordering the Cove on the east currently is used as lambing habitat, and its use could be discouraged or eliminated if human uses in the area south of the Cove are not properly managed. The draft EIR or subsequent document should more carefully address and offset these significant adverse effects to bighorn sheep.

Response: As shown on Exhibit III-2, the Recommended Alternative applies only the following land use designations to land in Sections 13 and 24, immediately south of the Cove: Open Space (OS), Open Space with a

Hillside Overlay (OS/Hillside), Watercourse (W), and Park (P). The peninsula east of the Cove is primarily managed by the Bureau of Land Management and is designated as Open Space with a Hillside Overlay. As described on page I-18 of the draft EIR, permitted land uses on such lands are extremely limited, and future urban development is precluded. The Open Space designation applies to lands in public and quasi-public ownership and allows for the discretionary approval of trails, trailheads, and related facilities. The Hillside Overlay is applied to land above the toe of slope, to which the provisions of the Hillside Protection Ordinance apply. The Watercourse designation applies to floodways and drainage channels, and the Park designation applies to existing municipal and regional park facilities.

Project-specific environmental analyses shall be required to identify and mitigate potential impacts to bighorn sheep for any future development proposal.

M.10. Comment:

Page III-114, Mitigation Measures. To address our concerns described above, General Plan policies should be adopted that more effectively (1) conserve bighorn sheep habitat and establish strategies or implementation mechanisms to accomplish this objective, such as creation of a habitat acquisition fund, (2) require appropriate avoidance, minimization, and mitigation measures for proposed habitat losses, and (3) require completion of a trails management plan prior to the construction of any further projects in bighorn sheep habitat. The trails plan should be subject to the review and approval by the Service and Department and be coordinated with the trails management program in preparation under CVAG's multispecies (sic) planning effort. The plan should include a comprehensive system of appropriate signs, trailheads, management and enforcement capabilities, and other facilities to manage access along the habitat/urban interface to afford effective control of human uses in adjoining bighorn sheep habitat.

Response:

(1) All future development shall be required to establish project-specific strategies that mitigate potential impacts to bighorn, wherever necessary. The continued implementation of the City's Hillside Conservation Ordinance and the application of the Open Space/Hillside Overlay land use designation to sensitive hillside areas and designated bighorn habitat will further reduce impacts to the species.

(2) Given that the proposed Plan designates sensitive hillside areas as Open Space, a designation which precludes urban development, implementation of the General Plan is not expected to result in any direct habitat losses for the bighorn. Nonetheless, the City will continue to participate in the development of the Coachella Valley Multiple

Species Habitat Conservation Plan (MSHCP), which will establish procedures for avoidance, minimization, and mitigation measures for all species covered by the plan, and will continue to implement the mitigation measures included in certified EIRs for previously approved and future projects.

(3) The General Plan is a broad-reaching policy document, and it is beyond the scope of the General Plan to include a formal trails management plan. However, the City is currently participating in the Bureau of Land Management's trails component of the California Desert Conservation Area Plan, and will continue to participate and consider its adoption when completed. The plan is being coordinated in conjunction with the MSHCP, in which the USFWS and CDFG are already involved.

M.11. Comment: Page III-115, Item H. The recommended burrowing owl surveys should be expanded to include other habitats in addition to agriculture, given the species' widespread occurrence throughout a variety of habitat types in the Coachella Valley.

Response: Comment noted. The burrowing owl is known to occur in agricultural areas, which was the basis for the mitigation measure. The owl is also known to occupy burrows of Palm Springs Ground Squirrel, and the banks of washes or streams. The mitigation measure is therefore amended to read:

"Agricultural lands, stream banks and areas mapped as potential habitat for Palm Springs ground squirrel which are being converted to development shall be surveyed for the presence of burrowing owls, according to California Department of Fish and Game protocol."

M.12. Comment: _____, Item K. We recommend that the City modify the mitigation measure and policy to require, not just "consider", a contingency-based measure, as described in the Recovery Plan. Accordingly, for new projects that create a potential attraction to sheep for urban sources of food or water, the City should adopt a policy that would require project-specific conditions of approval for future fence construction should sheep become attracted to urban areas. To be workable, this contingency mechanism should provide the wherewithal to require future construction of a fence if sheep problems arise. Providing the wherewithal would necessitate (1) dedication of a fencing easement, (2) provision of a funding mechanism, and (3) establishment of a responsible party, at the time of project approval.

Response: Comment noted. The terminology used in Mitigation Measure K is consistent with the language used in the Recovery Plan, which states that

“fencing should be mandatory” (Recovery Plan, page 218), but does not require that it be installed. Nonetheless, Mitigation Measure Item K is hereby amended, as follows, to clarify the need for fencing adjacent to sensitive hillside areas.

“To reduce the impacts of urbanization on bighorn sheep, the City shall consider requiring barriers between future development projects and the adjacent hillside if bighorn sheep are demonstrated to occur on the subject property or adjacent hillside. Informal consultation and/or review by the U.S. Fish and Wildlife Service and California Department of Fish and Game shall be completed prior to construction of any barrier, so as to assure appropriate, safe, and effective barrier design.”

Individual development projects shall be conditioned, as necessary, during the City’s project review process. The City has in the past considered conditions of approval and/or mitigation measures which established funding mechanisms, responsible parties for ongoing maintenance, etc. at the time a project was approved, and will continue to do so as appropriate.

N. LEE ANDERSON, JR.

N.1. Comment: (1) The report states that the agricultural overlay “provides for continuation of existing agricultural activity at the discretion of the landowner until he chooses to change its use”. This is not good enough. Let agriculture be a permissive (sic) use in any area, or at least in areas that have The La Quinta designation of very low density and low density uses. Agriculture cannot be protected by an agricultural overlay. It needs its own designation. An agriculture zone should be basic and agriculture should be a permitted use in any area. Landowners and the city need the flexibility to use land for agriculture should an economic downturn slow building development.

Response: The commentor’s opinion is noted. In order to implement the Agricultural Overlay, the City will be required to adopt Zoning Ordinance guidelines and standards. These will be adopted subsequent to General Plan adoption, and will include land uses currently allowed under Riverside County zoning ordinance, as discussed in public meetings held by the City Council and Planning Commission.

N.2. Comment: (2) Under mitigation measures there needs to be added protection for land that is already in agriculture. La Quinta should enact “Right to Farm” legislation similar to that in effect in the Riverside County area.

Response: Comment noted. The following mitigation measure shall be added to Section III-B-3.:

H. Prior to the Conducting Authority Hearing before the Local Agency Formation Commission which includes any parcel of land currently in agriculture, the City shall adopt an ordinance whose intent and content is equivalent to Riverside County ordinance 625.1, including a notification requirement of 300 feet.

N.3. Comment: The study states that it estimates that approximately 40% of domestic water consumed would be reabsorbed into the ground water table. This is not true in the middle valley area due to numerous clay layers that prevent percolation. This is why much of the farming area contains tile lines.

Response: The percentage has been provided by the Coachella Valley Water District, and represents an average for its management area. Although some areas of the City and its planning area include clay, others do not, and provide a high percolation rate.

O. KAY WOLFF

O.1. Comment: 1. The General Plan does not spell out any general locations, acreage, or percent of acreage for parks, trails or other public use lands. These uses are lumped together with golf courses, which are a) mostly private, b) costly for citizens to use, and c) severely impact our water supply, due to the residences that typically surround them. In order to insure the quality of life of our residents, we need to specifically assure that facilities for youth and adults are abundant and conveniently located. Where are the formulas (minimum expectancies) for parks and open space? Open space needs to be more than mountains and golf courses. We are below our guidelines for public parks within our current boundaries: let's fix that first.

Response: The General Plan establishes, by policy, a standard of 3.0 acres per 1,000 residents (Policy 2, Parks and Recreation Element). Exhibit 5.1 of the General Plan identifies the existing and proposed parks within the City and its planning area. The General Plan establishes locations for trails in Exhibit 3.10 of the Circulation Element. The Master Environmental Assessment of the General Plan includes quantified discussion of existing and proposed park lands and deficiencies within the City and its planning area. Finally, Programs 2.1 through 2.5 of the Parks and Recreation Element provide the City with a number of options for funding park acquisition and improvement.

O.2. Comment: The verbs used in the General Plan are too loose: "encourage, try to, evaluate, consider, pursue, etc." How about setting some specific goals? How about some "wills and shall"? We can afford to be selective and make demands on developers.

Response: Comment noted. The General Plan provides both directive and suggestive policy, based on the policy direction provided. The City Council continues to consider text changes throughout the public meeting and public hearing process. The commentor is also encouraged to articulate proposed changes to General Plan language in public hearings to be held before the Planning Commission and City Council.

O.3. Comment: In order to avoid the negative impacts of water, traffic, noise, pollution, and loss of cultural heritage as pointed out in the DEIR, I believe residential developments should be exclusively "very low density residential" and interspersed with open space and public parks and trails. If developers of high, medium, and low density developments don't like our zoning, let them take their development elsewhere. We can afford to

be picky. Why become a high density community when we are positioned to be the most desirable city the Coachella Valley?

Response: The commentor's opinions are noted.

O.4. Comment: The DEIR clearly points out the many negative impacts of the potential annexation of Annexation No. 12 and the Sphere of Influence. These very negative impacts need to be clearly publicized to the community before the passage of any plans. For example:

a) The possibility of being a city of some 208,000 is horrifying! Who moved to La Quinta to be in a big city? Let's take good care of what we've got, and not plunge into the managerial and safety morass of a metropolis! Do we want to be considerably larger than San Bernardino?

Response: The commentor's opinions are noted. The City Council and Planning Commission have directed that the planning area boundary be reduced.

O.5. Comment: The annexed areas would be a tremendous financial drain on the current city, with an annual negative cash flow of almost \$7 million (DEIR Tables III-46 and 47). Since LAFCo has stated that La Quinta annexation will not be "piecemeal", that implies that we will have safety obligations prior to the development of most properties. We will have financial responsibilities without significant revenue to offset these costs. With assessments already afoot for police and fire protection inside our current boundaries, what would that mean for the future? Most citizens are against assessments for such services, especially when they may not favor annexation in the first place.

Response: The commentor's opinions are noted. The cost/revenue analysis represents a buildout analysis based on the land uses proposed within the Annexation and Sphere of Influence areas described in the EIR. Since both are primarily residential in nature, and residential development does not generate sufficient revenue to maintain services in most cities, both the Annexation area and the Sphere of Influence represent an annual loss at buildout. When these two areas are considered as part of the overall development and buildout of the City, however, a positive cash flow is expected (see table III-46 of DEIR).

O.6. Comment: The DEIR mitigation measures to resolve water issues are inadequate. Any residential development will surely jeopardize the fast-receding aquifer in this Valley. Any governing agency will be faced with its depletion and must proceed with extreme caution.

Response: Mitigation measures associated with water in the DEIR represent the City's continued effort to support and assist the Coachella Valley Water District in protection of the water resource. The District, however, has control of this resource, and not the City. The City has implemented ordinances which reduce water usage, and the General plan continues to support these reductions, and provide the City with policy supporting conservation efforts both at the local and regional level. The impacts associated with individual projects which occur after adoption of the General Plan will be addressed at the time each project is reviewed by the City.

O.7. Comment: The impact of two airports has not been sufficiently addressed in the DEIR: noise traffic, safety, and economic impact. No noise study was conducted on projected expansion runways and larger aircraft. If the Regional Airport is going to be developed, and owned by La Quinta, what are the costs to develop new runways, terminals, etc.? Even if not owned/managed by La Quinta, the problems of safety and additional noise will impact those who live in the area. Are these the problems we need within the boundaries of La Quinta?

Response: The commentor is incorrect. The noise studies prepared for both airports is referenced in the DEIR, including noise contour maps provided in each airport master plan. Further, the noise study for the General Plan monitored noise levels at both airports (monitoring sites 1, 10 and 11, please see discussion on page III-44 ff. Of the DEIR). There is no plan for La Quinta to purchase the airport, nor is one considered in either the General Plan or DEIR. Development is regulated by federal standards adjacent to airports, and both the existing County of Riverside land use assignments and those proposed in the General Plan for those portions of the planning area affected by airports reflect the potential impacts associated with airport development. Noise and safety issues are also addressed extensively in both airport master plans.

O.8. Comment: The cultural element of the DEIR seems only to address the 372 Native American archaeological sites, but does not mention our recent cultural history of agriculture, equestrian and art. Where is the preservation of date and citrus groves? Of equestrian trails and ranches? Where is the support for the arts? The City has let a prime location for a citrus orchard/date grove/park to slip by (Eisenhower and Tampico): what a lovely reminder of our past that would have been! The City should have purchased this, and should purchase the wash along Montezuma/Bike Path and preserve it for the future. Equestrian trail with parks would be charming, and a wonderful place for families to experience our cultural past (just ask Frank Bogert about horseback riding in La Quinta). As for the Native American sites, where are the trails and parks for people to

enjoy the petroglyphs, fish traps, and sites where they lived? Instead of sealing them up, let's work with the local tribes to develop awareness of their culture. These need to be accessible on site, not just in the Historical Museum.

Response:

The commentor's suggestions are noted. The Master Environmental Assessment of the General Plan includes discussion of the City's agricultural and ranching heritage, and methods available to preserve both. The Cultural Resources Element of the General Plan includes policies and programs to protect and encourage preservation of all aspects of the City's cultural heritage. The City did not own the land mentioned by the commentor at the corner of Eisenhower and Tampico. The owner of the property made proper application to the City for development of the site. Public hearings were held on the matter by both the Planning Commission and the City Council.

The La Quinta Evacuation Channel is owned by the Coachella Valley Water District. The City encourages the use of the banks of flood control facilities for trails, and works closely with the District in the development of these trails as development occurs adjacent to them.

The current professional practice, due primarily to desecration and theft of Native American cultural sites, is to either excavate and remove, or bury resources. The City maintains the exact location of sites confidential in order to ensure that they are not vandalized, as is the practice.

O.9. Comment:

I believe that the mitigation factors outlined in the DEIR do not resolve the numerous negative impacts to the degree that we should expect for our City. We should defer approval of this plan and reject the DEIR until we can find a balance among size, environmental impact, and amenities due to our current residents. We cannot be enticed into thinking that bigger is better, because it usually isn't.

Response:

Comment noted.

P. JESSE M. MCKEEVER

P.1. Comment: Upon reading the environmental report on page M-7 under Water Resources, irrigation water from homes does not percolate to the aquifer. This statement is untrue as our Thermal area is a non homogeneous strata, it is made up of many hundreds of feet of very fine sandy clay barrier, that makes that statement impossible. If that statement was a true fact then it would be easy to find a location for artificial recharge in our area. In some areas of proposed annexation, surface water is very high, as proof the barrier is very efficient.

Response: The statement made on page M-7 is:

“It is estimated that about 40% of domestic water consumed, including a percentage of irrigation water applied to landscaping, is re-absorbed into the groundwater table and is not lost.”

The commentor’s assumption that the planning area is underlain by a single clay layer of “many hundreds of feet” is incorrect. The soils under the City and planning area vary greatly, and resemble a patchwork of different types of soil, including clay. The statement made in the EIR states correctly that a percentage of water used in landscaping percolates into the groundwater table. In some areas, that percolation is more rapid than in others, based on the soil layers.

The aquitard which results in a high water table in some areas of the planning area was originally a pocket of groundwater isolated by clay layers which underlie these areas. The high water table has been exacerbated by agricultural irrigation, which causes higher quantities of water to be trapped close to the ground. The water found in the aquitard will eventually percolate to the aquifer, over a long period of time.

The Coachella Valley Water District has identified a recharge location at Martinez Canyon.

P.2. Comment: Certainly, the author of the report is misinformed and does not understand even the basic principle of water recharge. I cannot believe that the City paid for such a report. How many other errors does it contain?

Response: As cited throughout the document, all data included in the Draft EIR regarding water resources was obtained from the Coachella Valley Water District.

P.3. Comment: We live in a DESERT and presently, we have had less rain or snow to naturally recharge our aquifer recovery, and at present we are lowering our water table yearly by alarming amounts, and in the City of La Quinta it is dropping drastically, and the City is not developing fully, how will it be when fully developed?

Response: The overdraft condition in the Lower Valley is estimated by CVWD to be 41,700 acre feet annually under current conditions. The District further estimates that by 2035, the Lower Valley overdraft condition will be 76,300 acre feet annually, without mitigation. (Source: Coachella Valley Water District "Water Management Plan," draft November 2000). The "Water Management Plan" includes comprehensive mitigation contained in several alternatives to alleviate the overdraft. Once implemented, these mitigation measures are expected by CVWD to eliminate the overdraft condition.

P.4. Comment: It is alarming to me to see the waste of good pristine ground water to irrigate illogical strips of grass along manicured avenues, and are especially designed at 45 angle or less so it runs off into the gutter, and as a solvent to destroy the streets.

The City just approved this type of landscaping at Ave 56/Monroe and Ave 58/Madison. This is a crime and should not be permitted just because it looks good to the occasional walker, bicyclist and passerby at 55 MPH.

Response: The commentor's opinion is noted.

P.5. Comment: Please do not annex my property as I DO NOT want to be associated with this kind of waste. How could learned men design, build and develop and approve such wasteful things.

Response: The commentor's opinion is noted.

P.6. Comment: Our water is ancient, it's being removed faster than it's capable of being recharged by man or nature. Seems to me if anything is approved we will continue groundwater mining at a higher rate than the present, as according to the proposed map most of this is developed farm land, using canal water for irrigation, and the water level continues to drop, what will happen when four houses per acre is approved?

We will be continuing groundwater mining instead of groundwater pumping. I know these (sic) from personal experience as a local Water Well and Pump Contractor.

Response: Comment noted. The water usage at buildout and the impacts of that usage are included in section III.F.3. of the EIR.

P.7. Comment: Also what concerns me is new developments i.e. houses and golf courses install “dry wells” designed to carry run-off of flood water, or irresponsible irrigated landscape, the latter is what the dry wells receives (sic) most and with the waste water goes oil, fertilizer, antifreeze, rotten grass cuttings from the neighborhood streets.

I was appalled when asked to clean out some of these “dry wells” as it was polluted and would not absorb anymore run-off. When a water well is drilled it is required to have the top 200’ cemented off to prevent pollutants from entering the aquifer and the City requires that on developments to directly introduce the pollutants into the ground, not a good idea.

Response: Comment noted. The City does not encourage the use of dry wells for drainage purposes. The City also implements the standards of the National Pollution Discharge Elimination System (NPDES) for all projects, which mandates, among other standards, that drainage be cleaned on-site prior to discharge.

P.8. Comment: Please use common sense and take a good look at what lies beneath us and is very little understood by the majority of the people including the ones who make major decisions. KEEP THE CITY THE SIZE IT IS UNTILL ALL IS UNDERSTOOD.

Response: The commentor’s opinions are noted.

Q. RICHARD M. FOXX

Q.1. Comment: I am writing in opposition to the acceptance of the Draft Environmental Impact Report (SCH NO.: 2000091023).

Response: Comment noted.

Q.2. Comment: This report points up the massive impact on the area in question. The residents of the City of La Quinta deserve to be fully informed about the wholesale desecration of this unique area. Such information should be disseminated by a series of well-publicized public information sessions with presentation by the appropriate agencies as well as by the planning and research people. This is done in other cities all over California with far less to lose.

Until and unless this is done, expediting the acceptance of this report through council constitutes nothing less than the most blatant manifestation of behind-closed-doors government.

Response: Fully advertised public meetings have been held on the General Plan since October of 1999. The City Council included General Plan discussion on its agenda on a monthly basis from November of 1999 through December of 2000. The release of the Draft General Plan, Master Environmental Assessment and Draft Environmental Impact Report on July 13, 2001, was advertised and posted, as required. The Planning Commission and City Council have held joint hearings on the Draft General Plan in September, November and December of 2001. Public hearings will also be held for the final review of the document by both the Planning Commission and City Council.

R. COACHELLA VALLEY ARCHAEOLOGICAL SOCIETY

R.1. Comment: After a review of the above Comprehensive General Plan document, the Coachella Valley Archaeological Society is in agreement with the findings, mitigations and recommendations as presented in the Cultural Resources Element of the Draft Environmental Impact Report.

Response: Comment noted.

R.2. Comment: It was noticed in the Management Summary portion of the Paleontologic Resources Mitigation Plan the informally designated Lake Cahuilla beds are shown to contain fossils of Pleistocene through early Holocene age throughout their extent. Yet, based on archaeological dating, many of the shoreline campsites found in the La Quinta area were occupied up until about 300 years ago. This should make the lake bed sediments present in those areas very late Holocene in age, not Pleistocene through early Holocene.

Response: The commentor mis-read the sentence. The statement in the Mitigation Plan reads:

“The results of this review demonstrate that two (2) lithologic units that may be affected by development within the boundaries of the La Quinta General Plan study area have high potential to contain significant nonrenewable Paleontologic resources: Pleistocene older alluvium and the informally designated “Lake Cahuilla beds.” (emphasis added)

The statement refers to two types of resources: those found in older alluvium, primarily associated with alluvial fans in the planning area, and those associated with ancient Lake Cahuilla.

S. ELLEN LLOYD TROVER

R.1. Comment: I believe it is premature to issue an EIR on “Annexation No. 12” & SOI when neither the Agricultural Overlay nor the Equestrian Overlay is drafted. Further comments forthcoming.

Response: Comment noted. Both overlay texts have been presented to the City Council, Planning Commission and public at public meetings held in September, November and December of 2001.

T. VIC BRODER

T.1. Comment: It would be wise to expand upon each issue on a website. This makes it possible for those involved in excess travel during August and September.

Response: The commentor's opinions are noted.

U. COLEY LINFOOT & KATHY LINFOOT

U.1. Comment: Finish one project before you begin another. There are a lot of uncompleted projects I see as I drive thru (sic) La Quinta. We hear for the Valley & its overpopulation. We've witnessed the rising humidity in the 20 yrs. We've been in the area. "Sprinkling" is a contributor, no doubt. All of the new residents want to live on a Fairway.

You truly have "paved paradise and put in a parking lot."

Response: The commentor's opinions are noted.

V. SUN COUNTRY RANCH, NORMAN AND GAYLE CADY

(Emphasis throughout added by commentor)

V.1. Comment: Page III-28, Section 3-G-EIR: ALL AGRICULTURAL and urban ACTIVITIES SHALL CONFORM TO THE NOISE STANDARDS described in Section 9.100.210 of the City Municipal Code and other mitigation measures set forth in Section III-J (Noise) of this EIR.

Page III-144, J-Existing Conditions: Evaluation of noise levels within a community is important to protecting the health and welfare of the general public, and can help define the need for remedial measures for existing noise problems and those associated with future development.

Page III-144, J-Noise Rating System: A number of noise rating scales are used in California to evaluate land use compatibility. The equivalent sound, or Leq scale, represents average constant noise level over a given period time, and is the basis for the Ldn and CNEL scales. Ldn value represents a summation of hourly Leq's over a period of 24 hours, and includes a weighting factor or **penalty for noise occurring in the nighttime period of 10:00 p.m. and 7:00 a.m.** The Community Noise Equivalent Level (CNEL) represents a 24-hour average noise level which includes a 5 dBA **penalty for noise occurring during evening time period (from 7 p.m. to 10 p.m.)** and a 10dBA **penalty for noise occurring during nighttime period (from 10 p.m. to 7 a.m.)**

Appendix E-EIR Noise Element Update Technical Report-pg 3: NOISE, as it has been simply defined is "UNWANTED SOUND." It is an undesirable by-product of transportation systems and industrial activities within a community that permeate man's environment and cause disturbance. The full effect of such noise on individuals and the community will vary with its duration, its intensity, AND THE TOLERANCE LEVEL OF THE EXPOSED INDIVIDUALS.

Mr. Baker, it is quite apparent La Quinta is making diminutive effort to accommodate and encourage the current rural, agricultural, and equestrian lifestyle and daily routine of Vista Santa Rosa residents. Expecting this community to arbitrarily accept your token inadequacy (sic) offering of an "Agricultural Overlay" versus qualified perpetuity agricultural and equestrian zoning ordinances is absurd. Demanding all undeveloped open space property immediately conform to "four houses per acre" zoning designation upon annexation is ludicrous.

Response: Comment noted. The General Plan and EIR specifically state that equestrian and agricultural activities can continue to occur until the

landowner chooses to convert his or her property. The noise generated on existing equestrian and agricultural land will not result in any penalties to the use. The language quoted by the commentator relates specifically to how CNEL noise are calculated, not to specific sites.

The commentator is incorrect in assuming that agricultural and equestrian zoning will not be implemented. Such text has been introduced at hearings of the Planning Commission and City Council held in September, November and December. This language includes right to farm provisions for existing agricultural and equestrian lands. Furthermore, as a conforming use, agricultural and equestrian land use can continue to operate as it has in the past. In addition, the City's Transfer of Development Rights provisions (Section 9.190) shall be considered for inclusion in the Agricultural Overlay district, thereby providing an incentive for the long-term preservation of agricultural parcels in the planning area.

V.2. Comment: **Appendix G-Seismic, Geologic and Flooding Hazards EIR-Pg I-2, I-5, I-28, I-29:**

“Liquefaction/Ground Failure: Portions of the La Quinta general plan are susceptible to liquefaction and landsliding or rockfall, both very destructive secondary effects of strong seismic shaking. Liquefaction occurs primarily in saturated, loose, fine to medium-grained soils in areas where the ground water table is 50 feet or less below the ground surface.

Liquefaction does not occur at random, but is restricted to certain geologic and hydrologic environments, primarily recently deposited sands and silts, in areas with high groundwater levels. Currently, shallow ground water, within 50 feet of the ground surface, is present ONLY in the eastern portion of the general plan area. Therefore, at present this is the only area susceptible to liquefaction.

Four general approaches apply to mitigation of liquefaction hazards: 1) AVOIDANCE 2) Prevention 3) Engineered Design, 4) Post-Earthquake Repairs. A prime way to limit the damage due to liquefaction is to AVOID AREAS SUSCEPTIBLE TO LIQUEFACTION.

Appendix G-Ground Subsidence Pg 2-7, 2-9, 2-10: Ground subsidence is gradual settling or sinking of the ground surface with little or no horizontal movement. This phenomenon is usually associated with the EXTRACTION OF oil, gas or GROUNDWATER from below the ground surface with a resultant loss in volume. Ground fissures were observed in the City of La Quinta in 1948. Regional subsidence related

to GROUNDWATER WITHDRAWAL is believed to have occurred in the Coachella Valley.

The GROUNDWATER BASIN IN THE COACHELLA VALLEY IS CURRENTLY IN A STATE OF OVERDRAFT.

GROUNDWATER LEVELS IN THE LA QUINTA AREA ARE DECLINING AT AN INCREASING RATE AS A RESULT OF VALLEY WIDE MINING FOR GROUNDWATER.

GROUNDWATER LEVELS IN 1996 WERE IN MANY AREAS LOWER THAN THE HISTORICAL LOW GROUNDWATER LEVELS.

These observed declines in water level have the potential to induce new or renewed land subsidence in the area affecting the City of La Quinta.

The timing of subsidence measurements corresponds with water level declines. Land subsidence is probably occurring and a significant part of the measured subsidence likely has occurred since 1991, about the time when water levels began declining below their previously recorded low levels. Land subsidence can result in the disruption of surface drainage, reduction of aquifer system storage, formation of earth fissures, and damage to wells, building, roads and utility infrastructure. Mitigation of subsidence requires a regional approach to groundwater conservation and recharge. Mitigation measures are expected to be difficult to implement....

Response: Comment noted. Please see responses P.1 and P.3., above.

W. MATTHEW P. WIEDLIN

W.1. Comment: La Quinta's Draft Environmental Impact Report projects that build out of the preferred alternative will increase the groundwater overdraft.

Response: Comment noted. The EIR states that buildout of the Plan will increase groundwater overdraft without mitigation. The EIR goes on to include a number of mitigation measures to lower the impact, including continued cooperation with the Coachella Valley Water District in implementing water conservation measures.

X. B. MANGAN SMITH

(Emphasis throughout added by commentor)

X.1. Comment: I am against the EIR Report – it is erroneous in many ways – and vague in others. Where are equestrian rights mentioned? Trails that have been here for over 50 years – are dismissed with a wave of the hand. Your agricultural overlay plan is not fully defined.

Response: Comment noted. Agricultural land uses, including horse ranches, and the impacts of the Plan on these land uses, are discussed in Section III-B of the EIR. Trails included in the Plan include all currently designated County and City trails, and the addition of multi-purpose trails in the planning area. The Plan does not propose to delete any currently designated trails, but instead connects new proposed trails to the existing trails system, particularly in the Coral Reef and Santa Rosa Mountains. The agricultural overlay is defined in the General Plan document, under the Land Use Element, Table 2.1. Policy establishing the overlay are included in the Plan. As a policy document, the General Plan is limited in its ability to implement these policies. The specific implementation measures will be adopted after adoption of the General Plan, through additions to the City's Development Code and Municipal Code. The hearings held by the City Council and Planning Commission in September, November and December introduced the text of the Development Code additions. The public hearings to be held by the Planning Commission and City Council for adoption of the Plan will continue this discussion, leading to adoption of new zoning text.

X.2. Comment: Spraying, burning, fertilizing, harvesting, and yes- even the need to create dust on occasion is needed by the farmer in order to survive – and produce food for you.

Response: The agricultural overlay does not preclude the activities mentioned by the commentor. The overlay specifically states that existing agricultural land uses can continue in perpetuity, unless the landowner wishes to develop his or her land. Dust (PM10) created by agricultural activities is exempt from SCAQMD standards for dust control, and therefore will not be impacted by the implementation of the Plan.

X.3. Comment: Roadways that are not 4 lane or 8 lane expressways are needed in rural/agricultural/equestrian areas – to move equipment from one farm/ranch to another safely.

Response: Comment noted.

X.4. Comment: The right to create noise – 24 hours a day is necessary for the farmer. Many crops in order to protect freshness, are harvested all night long.

In our harsh climate – tractors preparing fields will operate at night – easier on machinery and man.

The same is true of horse workouts – particularly in the summer – early AM or late evening workouts.

These items can not be regulated on paper by people who sit in air conditioned offices with no experience of life in the fields or from the top of a horse.

Response: Comment noted. The EIR does not preclude the harvesting of crops or any other nighttime activity due to noise levels. It is not clear that farm equipment operating during the night would result in an unacceptable CNEL noise level, since CNEL is a 24 hour average noise measurement. Should that occur, however, the proposed right to farm provisions of the new zoning standards which will be required upon annexation of any of the lands to the east of the City will preclude nuisance complaints.

The noise standards discussed in the EIR apply only to new development as it occurs, and will not affect existing agricultural activities.

X.5. Comment: It is also inconceivable to many of us aware of the value of the different horse properties in southern California – that money conceals (sic) La Quinta has overlooked – the potential for a million dollars per acre future growth.

If you people had done your “homework” properly and used good common sense – you would have recognized that fact and create the true gem of the desert – keeping and developing the wonderful enchanted village of La Quinta. With its (sic) special artifacts and also recognizing Vista Santa Rosa with its (sic) special needs and requirements. – A draw that would be unbeatable in the future. Man needs space – it will become a rarity as time goes on. Its (sic) peacefulness (and the spirituality of this valley) soothe men’s souls. Why do you give it away so cheaply. eg. – the Embassy Suites – La Quinta deserved better than that. I only hope it’s better looking than its (sic) art work!

Response: Comment noted. As previously stated, existing land uses of any kind in the planning area are allowed to continue until such time as the owner decides to develop his or her property.

X.6. Comment: I am against the plan for it's (sic) one year rule – regarding the use of land. A farmer should have the right to keep land fallow – should he choose to let it rest – without losing the right to farm. And when do you give the farmer the right to purchase horse acreage and farm it, if he chooses? Or where is the right for the farmer to sell land for equestrian use if he wishes to do so? And without time limitations.

Response: The commentor is incorrect. The “one year rule” would apply to a use which is legally non-conforming. The Plan proposes to make agricultural and equestrian land uses legally conforming. No time limitations would therefore apply, nor would the Plan preclude the sale of land or its lying fallow.

X.7. Comment: You choke us with your restrictions and control of our property rights – it is not Vista Santa Rosa that would take away property rights – it is the great stumbling giant of La Quinta who rules with an iron fist as to land use. The same City that creates high walls needing a 30% grade of water wasting grass that is so steep the sprinklers do not water the grass – they drain into the gutters and roll down the streets.

Response: The commentor is incorrect. The proposed Plan includes no restrictions on property rights. Further, the zoning text presented to the City Council and Planning Commission during hearings held in September, November and December directly parallels the existing zoning standards under which the residents of the planning area are subject under County jurisdiction.

The City reviews proposals by land owners for perimeter landscaping as those landowners request approvals. The projects must meet standards established for grade, water efficiency and nuisance water.

X.8. Comment: Your lack of concern for our true water situation in this valley is a dangerous one. WE DO LIVE IN A DESERT AREA – WHERE PUBLIC LANDSCAPING SHOULD REFLECT THIS FACT. Your Hydrology Report is way off and full of holes – who did it? Were you aware that in 1939 – 9 to 12 inches of water came down in one day in September and that in September 1976 2 to 4 inches of rain fell, causing flooding – imagine what that amount of rain does to clay soils! Add to liquafaction (sic) the term “grease” – and the threat of many homes in peril. Add to this your prediction (II-6) of earthquakes w/i the next 20 to 30 years. Not a pretty picture for builders to build homes for our citizens – but they do – eg. Shay (sic) Homes and Coral Mt developments. What ever happened to common sense and what's right and wrong? It has been tossed away by attention to developer pockets. Those who live out of the Valley.

Response: The commentor is incorrect. Appendix G of the EIR includes the full text of the “Seismic, Geologic and Flooding Hazards Sections of the Technical Background Report for the Safety Element for the City of La Quinta,” prepared for the General Plan update by Earth Consultants International. The EIR includes references to both storms mentioned by the commentor on page III-79.

The EIR includes mitigation measures for both ground shaking and liquefaction. The City currently implements standards for construction for both seismic and liquefaction zones. The standards represent the current knowledge of building officials throughout the state of California relating to these two conditions.

X.9. Comment: You in LQ claim to be sensitive to nature – what does the lighting of the mountains do to the night animals that live there? I also have noticed that those heavy duty lights were never turned off during the energy crisis???? Other people had to do w/o for those kilowatts used!

Response: Lighting of the mountains is prohibited under the City’s Development Code, which requires that all lighting be angled down and shielded.

X.10. Comment: As to Tamarisk in this area – they should be eliminated for the excessive surface water they consume and the salt they add to the soil – originally imported from China – they have outlived their use as massive wind breaks for the open lands. Other wind resistant trees can do the same purpose with less water use.

Response: Comment noted. The EIR does not encourage or mandate the use of tamarisk trees as wind breaks.

X.11. Comment: If as stated on II-11 the visual resources “most valuable assets are the mountain views and open desert vistas” why do you erect tall solid walls on tall berms to shut off – not only air movement but those same valuable assets – many of us are against this policy – but LQ rolls on w/o regard to good common sense or what the local people want!

Response: The commentor is incorrect. The General Plan does not include a policy mandating high walls. The City limits walls to a height of six feet, and restricts the construction of residential units of more than one story in order to preserve scenic resources. The proposed General Plan would further require that zoning standards be established for the height of berms, a standard which does not exist under the current General Plan.

X.12. Comment: Regarding air quality – your plan for urban sprawls (sic) – thousands and thousands more cars starting up and spewing their problems into all Coachella Valley cities’ air. (Yes we do have south winds that sweep up thru (sic) the rest of the valley). That will clearly put the air quality at more risk. 2000-2001 has shown the deterioration of our air quality – the mountain views have been more blurred and hazy than in previous years – remember the stark clear outlines in previous years before the construction boom?

Response: The EIR contains extensive discussion of the Valley’s current and projected air quality (pages III-125 through III-143). This section also includes extensive mitigation measures to improve air quality.

X.13. Comment: What do we do with our waste products? We are already running out of space for waste from those already here. In fact the local waste can not be accomodated (sic) now. Dump areas are too far and too few – so local roads and vacant areas receive the local trash. Solve local problems – before creating a monstrous problem in this area of more trash and waste accumulation – for this reason I am against your EIR.

Response: Solid waste disposal is addressed on pages III-177 through III-181 of the EIR. The City’s waste is currently disposed of at the Edom Hill landfill. Lands in the eastern portion of the Planning Area are serviced by the Mecca Landfill. Additional landfills either exist or are planned northeast of Moreno Valley, or at Eagle Mountain. These facilities and others have sufficient capacity to address buildout of the General Plan. This section includes mitigation measures to reduce the potential impacts associated with solid waste with implementation of the General Plan.

Y. VISTA SANTA ROSA PLANNING COMMITTEE

Ellen Lloyd Trover

Y.1. Comment: In our view, the most significant local issue pertains to the proposed “Agricultural Overlay.” The EIR makes several references to this important general plan component; yet, the associated text is not available in the document for review. This makes it difficult to fully gauge potential impacts and the effectiveness of the associated mitigation measures. We believe the Agricultural Overlay is of critical importance and urge the city not to defer its inclusion in the general plan text available for public review.

Response: The commentor is incorrect. The definition of the Agricultural Overlay is included in Table 1-3, page I-15 of the DEIR. Further discussion of the land use is included in section III of the EIR, page III-10, and pages III-21 through III-29. The General Plan establishes the land use designation, and defines its usage. The City, after the adoption of the General Plan, will be required to adopt Development Code standards, which have already been introduced at public hearings held in September, November and December of 2001.

Y.2. Comment: **Section III-A, “Land Use Compatibility”** characterizes 7% of the land area within Annexation No. 12 as “developed” (EIR III-14). The text also states that approximately 70% (3,782 acres) is currently designated for agriculture and very low density residential. The discussion should clarify whether land currently in agricultural production or other type of rural use is included within this classification. Much of the area is vacant, in agricultural production, or devoted to large parcel ranch and equestrian uses. In other words, the area is more accurately described as “rural” than developed. The opportunity to safeguard rural lifestyles as urbanization advances is a key issue for many in the area. For our purposes, “rural lifestyles” includes those uses currently allowed under the existing zoning and general plan classifications of Riverside County. Farmers should have the choice to continue with land in agricultural production, much the same as ranchers should be able to enjoy the use of their lands for horse ranching or other purposes currently allowed under the existing county ordinances.

Response: Comment noted. Table III-1 lists the existing General Plan land use designations, and the number of vacant and developed acres in each land use classification within the planning area. Any land on which any development occurs results in its inclusion as developed acreage. The statistical analysis in the EIR does not characterize land uses, simply quantifies where development has occurred.

The land uses identified under Riverside County's jurisdiction are allowed based on its Zoning Ordinance, not its General Plan. As stated above, the General Plan establishes the definition, and the Development Code implements this definition. The text proposed for inclusion in the Development Code was modeled after the Riverside County Zoning Ordinance, and will therefore allow the uses contemplated by the commentor.

Y.3. Comment: The city has assigned a pre-dominant (sic) general plan classification of "LDR" (2-4 d.u./acre) with an "Agricultural Overlay" overlying much of the same territory. However, the EIR does not provide a great deal of explanation with respect to the overlay. The discussion should be expanded to include more detailed information concerning the Agricultural Overlay and how it will allow for continued agricultural, equestrian and other rural lifestyles, as both interim and permanent uses. Specific concerns exist about potential land use conflicts arising as the urban edge expands outward, and there is an interface with agricultural uses. More particulars are needed that shed light on how the policies and standards of an Agricultural Overlay would ameliorate conflicts. Problems at the interface between agricultural uses and new developments could result in practical or legal difficulties and could have quality of life impacts.

Response: Please see response to comment Y.1., above. The definition of Agricultural Overlay states: "Any agricultural land use within this overlay area shall be allowed to continue until such time as the land owner chooses to develop." This statement makes it clear that existing farms, ranches and stables can continue to operate indefinitely. As previously stated, the City Council and Planning Commission have begun review of the zoning standards to be implemented after adoption of the General Plan, including permitted uses and "right to farm" ordinances.

Y.4. Comment: **Section III-B, "Agricultural Resources"** purports to use an Agricultural Overlay (as noted above, in order to "...preserve agricultural uses to the extent desired by landowners." The text continues, "Lands within the Agricultural Overlay will be allowed to continue cultivation as under the existing General Plan, until such time as the landowner chooses to develop." While such statements should offer comfort to those who intend to or are engaged in agricultural pursuits and/or rural lifestyles, the lack of specifics raises many questions. Rather than defer the details of the Agricultural Overlay to the future, the policies and standards should be drafted now. Many of the mitigation measures suggested by the EIR could be incorporated as

standards in the Agricultural Overlay. Some of the mitigation measures appear to address regulatory matters pertaining to agricultural use of property rather than measures intended to address impacts related to agricultural resources, i.e. 3. E. & F. Detailed information regarding the overlay would be useful; including the type of agricultural land uses coupled with definitive policies and standards. Further, the overlay should anticipate potential conflicts along the urban edge (as anticipated by the EIR) and offer solutions that have a tangible relationship to underlying technical data. For example, buffer design should be a function of evaluating the contributing factors associated with the impacts. Some examples are the type of agricultural activity, the proposed adjacent land use, the prevailing wind directions, noise contour modeling, pesticide drift, etc. The technical information should be used to arrive at a scientifically defensible buffer that will adequately mitigate potential impacts.

Response: Comment noted. Please see responses to comments Y.1., Y.2. and Y.3., above. The General Plan sets policy, while the Zoning Ordinance implements standards.

Y.5. Comment: **Section III-C, “Traffic/Circulation”** contemplates a circulation network featuring a system of arterial, secondary and collector roadways overlying a grid established by section lines. The Vista Santa Rosa Community Council’s “Vision Committee” has developed several preliminary “Vision Statements” for the area one of which may include large tracts of land developed as very low-density equestrian oriented communities. In some instances, the type of circulation network proposed may be over-designed to service the relatively low volumes of traffic generated by such enclaves and the cross-sections may be out of character with the design of such communities. One of the challenges of creating a cohesive, functional circulation system could be a land use pattern that juxtaposes the more traditional, higher density urban uses with rural lifestyle-type communities. Solutions will be needed that accomplish the disparate purposes of not compromising the design integrity of such areas while maintaining the integrity of the circulation system. One suggestion is that a roadway cross-section be added to its circulation element that is compatible with a rural lifestyle community, yet achieves the required Levels of Service.

Response: Comment noted. The circulation system and associated roadway cross sections have been designed to assure that adequate levels of service can be achieved with buildout of the Recommended Alternative of the General Plan. Should, over time, less intense land uses be developed in these areas, and the traffic generated by these land uses be demonstrably lower than currently predicted, the roadway standards will be amended.

Further, the construction of roadway improvements is tied to development. Therefore, if development in any portion of the planning area does not occur, roadways will remain in their current configurations.

Y.6. Comment: Section III-D, “Soils & Geology” indicates that much, if not all of the Vista Santa Rosa area features engineering and geologic properties that make it susceptible to geologic hazards such as wind erosion, ground failure, and expansive/collapsible soils. Table I-4, “Land Use Buildout Statistical Summary” projects a total of 12,225 units at buildout for Annexation No. 12. Using the average household size of 2.75 persons per household (as purported by the EIR), this equates to a population of almost 34,000 persons at buildout. Obviously, this is considerably more people exposed to the potential risk of geologic hazards than the current EIR estimated population of 639 residents. Of particular concern are liquefaction and in particular, subsidence risks. Subsidence risks are noteworthy because they are associated with pumping of groundwater, as the EIR suggests. At the current time, the Coachella Valley Water District groundwater management plan for the eastern Coachella Valley is being drafted. The EIR should consider the data and findings being used by CVWD in its study, and incorporate mitigation measures consistent with CVWD, if suitable. Also, the CVWD groundwater management plan envisions a long period of stabilization of the overdraft and replenishment of the basin to historic levels. It would be interesting to see a timeline that compares the anticipated absorption of units within Annexation No. 12 to the implementation of the groundwater management plan. It seems like there would be a correlation between the exposure of persons to potential geologic risk and the timing/success probability of the CVWD plan.

Response: Comment noted. The draft CVWD Management Plan was included in the research for the EIR. The EIR includes discussion and mitigation associated with CVWD, and its implementation of the Plan. The City will continue to cooperate with the District as it implements the Management Plan. The preferred alternative in the Plan would result in a reversal of current overdraft conditions.

As development occurs in any area identified as being susceptible to either liquefaction or subsidence, engineering techniques have been developed which shall be implemented. These techniques, includes in the City’s implementation tools, including the Uniform Building Code, are implemented on a case-by-case basis, in order to assure that site-specific considerations are addressed. The City Engineer will continue to review project on this basis until buildout of the General Plan occurs. As

standards and conditions change, the City's implementation tools will also be updated.

Y.7. Comment: **Section III-F, "Water Resources/Quality"** comments that approximately 40% of domestic water consumed is reintroduced into the groundwater table through percolation. However, other sections of the EIR note that the Thermal area features lacustrine deposits associated with ancient Lake Cahuilla, which contain relatively significant amounts of clay. Clay layers can act as barriers to groundwater recharge, or what the EIR refers to as "aquitards." This is evidenced by the extensive tile drain system in the area, which illustrates how percolation in some locations is in fact, very poor. It should be noted that the pilot recharge facility located near Avenue 62 and Madison Street to which the EIR refers lies upstream of what geologists commonly believe was the shoreline of ancient Lake Cahuilla. Therefore, the percolation characteristics of the surface and subsurface soils may be very different. The EIR should consider local factors in the area and make an assessment concerning how much domestic water can actually be expected to be recaptured in the groundwater basin.

The characteristically slow percolation rates in the area should also cause the EIR to revisit the premise that detention/retention basins will play any meaningful role in efforts to filter runoff and stabilize/recharge the groundwater basin.

A beefed up discussion of the CVWD groundwater management plan, including its data sources, findings and conclusions, if available, could be incorporated into the EIR. This would help ensure that there is synonymous thinking regarding the existing conditions and would be useful in gauging potential impacts and appropriate mitigation measures.

Response: The 40% figure provided by CVWD is based on an average within the Valley. Differing soils have differing absorption rates, and different uses of water have a higher or lower recycling potential. These items are averaged to result in the 40% estimate. The EIR is a program document, which addresses the General Plan as a whole, including all areas of the planning area. Individual conditions vary, based on the soil type occurring at any given location. The EIR is not intended to preclude further environmental analysis in the future. On the contrary, as individual projects occur, the City will have the ability to require additional environmental analysis under CEQA to review site-specific issues, including percolation and retention/detention basins. The City implements the standards of the National Pollution Discharge Elimination System (NPDES), as a co-permittee with Riverside County. These standards restrict new development's ability to discharge storm

water, and thereby require the implementation of a retention or detention system in conjunction with development. The City Engineer requires that individual projects prepare geologic studies to identify soils on individual sites, and design storm water systems based on those soils. This practice will continue throughout the buildout of the General Plan.

Y.8. Comment: **Section III-G, “Biological Resources”**, seems to infer that the city is planning to opt into the Multiple Species Habitat Conservation Plan now being prepared by the Coachella Valley Association of Governments and its members (of which La Quinta is one). However, whether this decision has been made or not is unclear. The text should clarify whether if the city does not opt into the MSHCP, the mitigation measures as proposed are deemed adequate to mitigate any potential impacts.

Response: The City is currently participating in the preparation of the Multi-Species Habitat Conservation Plan, as a signatory to the Memorandum of Understanding regarding that document. Until such time as the HCP is complete, and brought by CVAG to the City for adoption, the City cannot determine whether the document will be adopted. That decision will be made by the City Council at that time. The discussion in the EIR, however, reviews the species of concern within the planning area, regardless of their inclusion in the HCP, and proposes mitigation measures for those species. Should the HCP not be adopted by the City, those mitigation measures will continue to be implemented and be adequate to mitigate potential impacts.

Y.9. Comment: **Section III-H, “Cultural Resources.”** The Torres-Martinez tribe, though not subject to the general plan, is considered to be a part of the Vista Santa Rosa area. Therefore, we would urge the city to actively solicit the input of the tribal council concerning cultural resources, and for that matter, on all issues pertaining to general planning and land use.

Response: Comment noted. Program 1.2.1 of the Cultural Resources Element of the General Plan states:

“Establish and maintain channels of routine consultation with the Eastern Information Center at the University of California, Riverside, the Native American tribes, and the La Quinta Historical Society.” (emphasis added)

Y.10. Comment: **Section III-K, “Visual Impacts.”** As attempts to define a vision for the area encompassed by Annexation No. 12 and much of the SOI emerges (sic), preservation of scenic vistas to the Santa Rosa and San Jacinto Mountains is considered a very important matter. Other mitigation

measures that could be considered on a project-by-project basis include appropriate use of landscape materials to allow views, wall heights and materials, grading, etc.

Response: Comment noted.

Y.11. Comment: **Section III-L, “Public Services and Facilities.”** The provision of public facilities and services to annexed areas is an area of significant concern. Reliance is placed upon agencies outside the city, and over which the city has little or no control. However, some of the mitigation measures assign the responsibility for mitigation on these same agencies. Services that the city does provide will require funding commitments that once in place, will constitute an annual fiscal drain. Therefore, the viability of city-provided public services is seen as inexorably linked to the analysis contained in **“Section III-M, Socio-Economic Resources.”**

Response: Comment noted.

Y.12. Comment: The figures for Annexation No. 12 indicate a deficit of about \$5.4 million at buildout. This analysis is based on achieving an average density of 3 units per acre over the annexation area. It is assumed that the city anticipates offsetting the deficit with general fund surpluses resulting from the development and/or annexation of other areas featuring land uses possessing positive fiscal attributes to the city, i.e. commercial/industrial development and resort/hospitality. The EIR text should correlate the timing of Annexation No. 12 with annexation in other areas in order for the reader to better understand the projected cash flow on an annualized basis. This way, an assessment can be made of the potential impacts of timing shifts, or the underachievement of projected revenue sources in any particular year. Also, it would be interesting to know what the consequences would be of the density/intensity yield of Annexation No. 12 being underachieved, e.g. if the area were to develop at 2 units per acre, rather than 3, with the corresponding reduction in other non-residential uses as well.

Response: Comment noted. It is not possible for the City to determine the rate of growth in any area, and therefore predict the rate of cash flow associated with development on an annual basis. The estimates provided must therefore be based on buildout of the planning area. Should the annexation of any portion of the planning area proceed, the Local Agency Formation Commission requires the preparation of fiscal impact models which include both short-term and long term buildout estimates. These models will, if prepared in the future, more clearly estimate the cash flow described by the commentor.

The requested information on lower intensity development is provided for the entire project area, in the Section V, Table V-14.

Z. IRIS CAPITAL GROUP
Tracey Darroll

Z.1. Comment: This Draft EIR is not an objective assessment of the environmental impacts. It is biased and therefore does not satisfy the requirements of CEQA.

Response: The commentor's opinions are noted. The EIR addresses the mandated CEQA topics, provides research and documentation on current conditions and projected impacts, and mitigation measures. It fully complies with CEQA.

Z.2. Comment: The above referenced Draft Environmental Impact Report (EIR) for the Proposed Comprehensive General Plan ("The Plan") does not adequately address the following issues which should be resolved and corrected before the EIR is adequate per CEQA and any General Plan is updated. Many of these issues were raised before regarding your Notice of Preparation of an Environmental Impact Report for the City of La Quinta General plan up date (sic) notice to the General Plan, but were ignored. Again, I raise them, and refer you again to the letter by Ellen Trevor (sic) dated May 21,2001.

Per state law you are required to adequately address the issues that have significant impact and not with a biased view, but with an objective view which does not seem to be occurring.

Response: Comment noted. Please see response Z.1., above.

Z.3. Comment: The Agricultural Overlay is unclear. The Plan does not define in detail what types of properties are incorporated into the Agricultural Overlay yet refers to it constantly throughout the report. In fact there is no clearly written and defined agricultural overlay per the City of La Quinta. Therefore, the EIR is invalid until this is clearly defined.

Response: Comment noted. Please see response to comment Y.1, Y.2. and Y.3., above.

Z.4. Comment: The Socio-Economic impact of the proposed development on the equestrian industry and uses with the Annexation Area No. 12 (AA) and the proposed Sphere of Influence (SOI) have not been addressed even though this issue has been raised numerous times to the city of La Quinta in letter and verbal form, in City Council meetings, and in letters regarding the Proposed Notice of Preparation of the EIR. The Draft EIR still ignores the likely damage to the horse industry that currently brings

in about \$70,000,000 annually into the local region, and is projected to grow to \$120,000,000 in the next few years. Development of the annexation and SOI area with 2-4 houses per acre with no equestrian overlay and protections, wide roads, and resort, commercial and industrial development with only 100 foot buffer zones, will ultimately decimate this burgeoning industry by destroying stabling and training facilities, shrink the agricultural pasture lands making livestock and horses too expensive to keep, and decimate the local alfalfa industry. The Proposed La Quinta General Plan Alternative, will negatively impact the equestrian community and severely reduce local employment and tourism due to the equestrian industry, particularly for the Cities of Indio and Coachella.

Response: The General Plan does not propose to change any existing land use within the planning area. The Agricultural Overlay specifically states that existing land uses can continue in perpetuity, or until such time as the land owner chooses to develop. Further, the City does not currently have jurisdiction over the areas referred to by the commentor. Until such time as these areas are annexed, jurisdiction will continue to fall under the County of Riverside.

Z.5. Comment: La Quinta has provided no equestrian overlay or provision for equestrian use as a mitigation measure which would be easy to incorporate into the Plan, even though a significant portion of the entire area proposed to be annexed and put into the Sphere of Influence (SOI) is equestrian oriented. This must be addressed and thoroughly mitigated through wider buffer areas, reduced development density, smaller roadways particularly through the “Vista Santa Rosa” maintaining two lane rural roads and imposing 35 mph speed limits along with soft curbs and side of road areas for safe equestrian passage. The Vista Santa Rosa is bounded by Avenues 52 and 66, Harrison and Monroe.

Response: Comment noted. Equestrian land uses are currently considered agricultural land uses in the Riverside County zoning ordinance. The City has incorporated the same definition into the overlay. Therefore, equestrian land uses are inferred under the overlay designation.

As regards the roadway issue, please see response to comment Y.5., above.

Z.6. Comment: Per the County Regional plan, equestrian trails were to be incorporated throughout the area. They have been virtually left out in certain areas such as along Avenue 60, changed to golf cart paths or obscured in the Proposed General Plan and not addressed in the EIR in traffic issues, cultural resources, or socio-economic impacts. e. The EIR does not

address this issue and the Plan does not accommodate the trails that should be shown and were provided for in the Specific Plan for PGA West and in the Regional Plan.

Response: Comment noted. The Riverside County General Plan does not show a trail on Avenue 60 (Exhibit IV-19). The trails shown in that exhibit have been incorporated into the City's trail exhibit (Exhibit 3.10, General Plan). Equestrian trails are described in the General Plan as "Multi-Purpose" trails, and are included throughout the planning area, including PGA West.

Z.7. Comment: Wildlife corridors and movement to open space will be destroyed. The trail system would of (sic) allowed wildlife movement throughout the area. A valid, safe and complete equestrian trail system would allow for the corridor/movement of wildlife throughout the area and to open space. With the lack of an adequate trail system through this area, La Quinta will have destroyed any ability of the native wildlife to have survived. The trails should go throughout the area, and roads made smaller down to two lanes with soft edges instead of curbs to provide and protect wildlife movement and equestrian usage.

Response: Comment noted. Please see response to comment Z.6., above. As regards the viability of equestrian trails as wildlife corridors, it is generally accepted that the width of an equestrian trail, generally ranging from 8 to 12 feet, is insufficient to provide adequate space for a wildlife corridor.

Z.8. Comment: The proposed development density, road system, and traffic load will destroy the ability to utilize the roadways safely for agricultural or equestrian uses. The proposed traffic increase to 1,250,000 traffic trips per day will make unsafe usage of the roads for livestock, horses, or farm equipment. Per CEQA this must be thoroughly addressed and mitigated which has not been done.

Response: Comment noted. Please see response to comment Y.5., above. Livestock, horses or farm equipment will continue to have the ability to utilize the regional roadway system, within the parameters of State vehicle codes. The adoption of the General Plan will not impact that ability. Should the General Plan build out with the land uses proposed on the Recommended Alternative Land Use Map, the roadways proposed will be necessary to accommodate the level of service.

Z.9. Comment: Per CEQA, traffic plans must accommodate the movement of agricultural equipment when the annexation is of agricultural land. This has not been done. Furthermore, the traffic plan would not

accommodate horse trailers. The roundabout at Jefferson and 52nd right near the Polo club is impossible for a large trailer to navigate safely.

Response: Comment noted. Please see response to comment Z.8., above. The roundabout at Jefferson and Avenue 52 has been designed to accommodate street-legal vehicles of all types.

Z.10. Comment: The proposed roadway system and traffic plan would destroy the scenic resources of the area. One of the most beautiful roadways in the entire area is palm tree-lined Avenue 60, between Jackson and Van Buren. Yet it is planned to be major arterial. The impact of the roadway system destroying scenic resources must be addressed and mitigated. The roadway system is too large and aggressive throughout the Vista Santa Rosa area. It should be reduced to two lanes, soft curbs, no lights, and 35 MPH speed limits.

Response: Comment noted. Please see response to comment Z.8., above. The City's standards for parkway landscaping will be imposed, should any roadway in the planning area fall under its jurisdiction in the future. These standards include setback requirements, berming and landscaping to ensure aesthetics are maintained.

Z.11. Comment: The claim that "This land use designation of up to two units per acre provides a transition between agricultural lands and more intense urban uses and promotes a progression of compatible land uses." (sic) This is invalid as a transition as the density will provide significant problems for neighboring agricultural/ranch uses.

Response: Comment noted. The City's implementation of agricultural zoning standards, right to farm and notification requirements will protect existing agricultural and equestrian properties in the future.

Z.12. Comment: Mitigation of buffer areas of 100 feet are completely inadequate. It should be 500 feet and the zoning density decreased significantly.

Response: Comment noted. The provision of buffering is only one component in the proposed implementation of the Agricultural Overlay. In combination with development standards, notification requirements, right to farm standards and other provisions considered by the Planning Commission and City Council, they provide adequate mitigation between urban and agricultural land uses.

Z.13. Comment: The No Project Alternative would be a better choice. It would preserve the current agricultural land use designations and preserve the ability to farm and allow the growth of the equestrian industry.

Response: Comment noted.

Z.14. Comment: The traffic impact at build-out (sic) which would generate approx. (sic) 1,200,150 daily vehicle trips per day in the area, would have a significant impact. It would not operate within acceptable levels in the annexation and SOI area. 15 roadway segments would exceed capacity. This would cause a significant impact on agricultural and equestrian usage. To state otherwise is biased.

Response: The commentor is incorrect. All of the roadway segments and intersections in the Annexation area and the Sphere of Influence are expected to operate at an acceptable level of service at buildout. The referenced 15 roadway segments are all located in other parts of the planning area. The segments are:

Street Segment	V/C Ratio
Washington St.: Avenue 44 to Miles Ave.	1.20
Washington St.: Miles Ave. to Highway 111	1.15
Adams St.: Highway 111 to Avenue 48	1.03
Monroe St.: Miles Ave. to Highway 111	1.03
Jackson St.: Indio Ave. to Highway 111	1.03
Auto Center Dr.: Interstate-10 to Indio Ave.	1.08
Dillon Rd.: Highway 86(S) to Highway 111	1.01
Avenue 50: Highway 86(S) to Vista Del Sur	1.05
Country Club Dr.: Oasis Club Dr. to Washington St.	1.03
Fred Waring Dr.: Oasis Club Dr. to Washington St.	1.02
Highway 111: Washington St. to Adams St.	1.08
Highway 111: Jefferson St. to Madison St.	1.01
Highway 86/111: Auto Center Dr. to Dillon Rd.	1.17
Highway 111: Avenue 52 to Tyler St.	1.03
Highway 111: Airport Blvd. To Filmore St.	1.08

The EIR states that these roadway segments will be impacted, and provides mitigation measures to reduce the impacts.

Z.15. Comment: Water Resources will be significantly impacted per CVWD. The EIR does not adequately mitigate or address the depletion of the groundwater and the depletion of local wells of the residents in annexation and SOI areas. Again the EIR is biased. Per The (sic) EIR states that CVWD has demonstrated that groundwater recharge at this location south of Lake Cahuilla since 1996 has been feasible. This is not completely true and misleading.

Response: Comment noted. The District's Management Plan, and a number of other documents published by the District, include the Martinez Canyon recharge basin project. The District has indeed included this project in its planning efforts for several years.

Z.16. Comment: The claim that 40% of domestic water is re-absorbed into the groundwater table and not lost is not true in the lower eastern Coachella basin. Moreover, any recharge water is not as clean as the original groundwater. The impact of this has not been adequately addressed. There will be a need to build out new treatment plants—who pays for this and what is the socio-economic impact of this on the area residents? Who will mitigate the residents for their wells drying up as the overdraft on the water table is furthered by the proposed development.

Response: As previously stated in response to comment Y.7., the re-absorption rate discussed in the EIR is an average, and actual conditions will vary in different parts of the planning area. Water which is re-absorbed, if provided from wells, is treated by the District, and meets all standards for potable water.

The District will determine the need for additional facilities through their planning process, and will have a number of options for financing facilities, including connection fees, assessment districts and bond issues.

The purpose of the District's Management Plan, and the City's water conserving ordinances for building and landscaping, is to prevent "wells drying up." The City will continue to review individual projects for their conformance with water conserving measures, will continue to cooperate with the District in the development of water conservation measures, and will also continue to route projects to the District for comments as they occur.

Z.17. Comment: The EIR claims La Quinta will protect domestic water supplies. How? The socio-economic impact on the residents of switching from septic and wells to CVWD has not been addressed. Again, who pays for this and the sewer lines? And what is the impact on the residents. (sic)

Response: The General Plan is a policy document, which will not preclude individual project reviews in the future. The City's standards, as established in the Municipal Code, will be applied to all future projects which are proposed in the City.

The policies in the General Plan requires that new development connect to water and sewer lines. Existing development is not required to

connect. The District has established assessment districts in the past to connect un-served neighborhoods to sewer system extensions, in order to protect groundwater. The District offers a number of options to homeowners under such assessment districts, and generally does not require connection unless the septic tank on a particular property is failing, and poses a hazard. These issues will be addressed on an individual basis as projects are proposed in the future.

Z.18. Comment: There is no real provision for Open Space or biological resource survival. The EIR states “the general Plan annexation and LOI (sic) land use designations all propose to maintain a low density development pattern and preserve sensitive biological areas as undevelopable open space.” Identifying golf courses as open space is not per government code. A golf course is not a valid resource area for biological survival as golf courses have a high usage of pesticides and chemical fertilizers. This must be addressed. Implementation is not expected to have a significant adverse impact on biological resources.”---This is not true! No where (sic) in the midst of the area La Quinta claims to be preserving is there any really useful open space except the edge of some rocky knolls that are really impossible to utilize except for rock climbers and bighorn sheep. The lack of wildlife corridors and greenbelts without walls, that allow access to real open space areas, will significantly impact the biological resources of the area.

Response: The commentor is incorrect. References to open space in the Biological Resources section of the EIR do not refer to golf courses. Open space areas for biological preservation, as described in the EIR, include areas above the toe of slope, natural open space which may be preserved on individual properties in the future, and the preserves set aside for Coachella Valley Fringe-toed Lizard preservation areas. In addition, future preservation areas, as proposed in the Coachella Valley Multi-Species Habitat Conservation Plan, if and when adopted, are appropriate biological resource preservation areas.

The EIR clearly defines the areas of the City and planning area where sensitive biological resources occur, and provides directive mitigation measures requiring site-specific studies for those species. The studies, when completed, will include mitigation which relates to individual project impacts, potentially including on- or off-site preservation of land. Because of the issues associated with specific species in specific locations, the continued review of individual projects is the most appropriate method to ensure long-term preservation of biological resources.

Z.19. Comment: The potential increase in pesticides and chemical fertilizers due to the increase (sic) golf courses and median and roadway strips has not been considered on the groundwater and wildlife.

Response: Issues associated with groundwater contamination are addressed under Section III-F, page III-93, mitigation measure I, page III-95, and Mitigation Monitoring Program item A. The City shall continue to review individual project proposals as they occur, and enforce the required local, regional, state and federal standards associated with pesticide and chemical use.

Z.20. Comment: The destruction of prime farmlands has not been fully addressed or mitigated. Over 30% of all the dates in North America are grown in the Vista Santa Rosa area of the plan alone. In the entire annexation and planning area, the number could be virtually 80%. This issue has not been fully addressed or sufficiently mitigated.

Response: The impacts of the General Plan on farmland is addressed in Section III-B, pages III-21 through III-29. The potential loss of agricultural lands if the landowner wishes to stop farming and convert the land to another use has been identified as being significant, even with mitigation.

Z.21. Comment: The destruction of the scenic resources of the area has not been fully addressed or mitigated. The views of the Santa Rosa mountains is one of the most special parts of the area, loved by all who live in the area or visit. There is nothing in the plan that truly protects that, such as the elimination of walls and berms, and the plan for view corridors.

Response: Issues associated with aesthetics are addressed in the EIR under Section III-K, Visual Impacts, pages III-159 through III-164. Mitigation measures include provisions for the protection of viewsheds throughout the planning area, including mitigation measures F., J., L., M. and N.

Z.22. Comment: Air pollution increase in the basin is falsely represented as it will be significant due to the increased motor trips.

Response: The air quality impacts associated with buildout of the General Plan have been calculated using the current methodology required by the South Coast Air Quality Management District. The calculations are shown in section III-I, on pages III-132 through III-140. This data accurately represents the potential air pollution emissions for buildout of the General Plan.

Z.23. Comment: More open space is defined as golf courses. Golf courses may or may not be public or visible so it is not real “open space”. And is a misuse (sic) and misleading term.-1-22.

Response: Comment noted. The General Plan identifies Open Space lands in four categories: Park Facilities, Open Space, Golf Course and Watercourse. These lands in the aggregate represent a total of 14,120 acres under the Recommended alternative. The lands assigned the Golf Course designation total 4,694 acres, or 33% of the total Open Space lands. 66% of Open Space lands are public lands.

Z.24. Comment: II-3 Agricultural Resources: Never mentions equestrian uses, pasture and alfalfa, which is inadequate.

Response: Comment noted. The description of the area as “agrarian” provides a general description of the existing. No specific usage was intended.

Z.25. Comment: The planned additional 66,811 residential units at 75% build-out (sic), is outrageous for the area, and will have a more than significant impact on all aspects of the area. That is a virtual another Los Angeles. This will destroy the local economy as the reason people come from LA is to get away from the density. The negative impact to the local economy of the proposed development must be considered.

Response: The EIR analysis represents a conservative (worst-case) analysis of the development potential of all lands in the planning area. Socio-economic impacts are addressed on pages III-191 through III-209 of the EIR.

Z.26. Comment: On page III-10, the EIR states “the proposed land use densities and assignment do not appear to pose any significant land use incompatibilities with existing or planned land uses in adjacent jurisdictions.” This is completely untrue and biased. All the true and cumulative impacts must be addressed.

Response: The General Plan does not propose land uses which are incompatible with the land uses in adjoining jurisdictions. The land development pattern in Indio, Coachella and the unincorporated portions of Riverside County adjacent to the current City limits include projects, both approved and constructed, which range in density from 2 to 8 units per acre. The land use map of the General Plan proposes similar densities, and therefore demonstrates a consistent development pattern.

Z.27. Comment: Open space Land uses---III-12 No real open space is actually being planned. Golf courses are not Open Space. The park area actually planned in the annexation and sphere of influence area is only 20 acres,

in an area comprising over 12,000 acres. This is completely inadequate for the public and potential residents.

Response: Please see response to comment Z.23, above. The General Plan identifies a need for 3 acres of parkland for each 1,000 residents (Policy 2, Parks and Recreation Element), and clearly shows that future parkland will be required. The specific locations for parks, unless currently owned by the City, have not yet been identified.

Z.28. Comment: The Summary of Impacts is invalid and biased. On page III-13, the EIR states that “impacts within the City of La Quinta and on surrounding lands resulting from adopting implementation of the proposed General Plan are not expected to be significant” This is completely false. How can an additional 1,250,000 daily traffic trips and 66,000 new homes immediately adjacent not be significant? This is a biased EIR. The impact on agricultural alone will change the financial dynamics of Indio and Coachella and Riverside County. The ultimate elimination of equestrian ranches will impact the horse industry and dynamics of that vital industry in the desert to say nothing of the removal of year round activities being changed to resort and second homes thus diminishing year round activity for many business.

Response: Comment noted. The EIR addresses the mandated CEQA topics, provides research and documentation on current conditions and projected impacts, and mitigation measures. Areas where impacts may be significant are clearly identified. The EIR fully complies with CEQA.

Z.29. Comment: The EIR states that the approval of the SOI amendment would not result in any significant adverse environmental impacts to lands within the SOI or its vicinity, per their EIR. This not true, and again biased. It would diminish the local residents self-destiny and would encourage more development, as La Quinta is pro-development. It will diminish the equestrian interest in the area and thus reduce the value of the local properties, as the plan does not accommodate equestrian interests.

Response: The commentor is incorrect. The City currently has no jurisdiction over lands outside its City limits. Should any of the planning area lands eventually be annexed, the General Plan clearly states that all lands currently in agricultural land use may continue in such use until such time as the land owner wishes to develop another land use. The equestrian interests in the area will be diminished only if the land owners choose to sell or convert their ranches.

AA. CITY OF INDIO

AA.1. Comment: Our conclusion – the DEIR fails to meet the minimum legal requirements for both procedural and substantive aspects necessary to carry out a complete, thorough and objective analysis in accordance with CEQA. In particular, the DEIR is flawed and deficient in the areas of:

Proper notice to affected and adjoining governmental jurisdictions.

Response: Comment noted. The City of Indio was sent the Notice of Preparation and the Draft EIR. The Notice of Availability was published in the City's adjudicated newspaper. The City has complied with CEQA in providing public notice to all responsible parties.

AA.2. Comment: General Plan, zoning and land use descriptions of Indio Rancho Country Estates and Polo Resorts properties immediately adjacent to your area of Interest and north of Avenue 50 and 52 in the City of Indio are not identified or are inadequately described. These are areas of particular concern to the City of Indio, its residents and investors and must be addressed in the DEIR.

Response: Surrounding land uses for all adjacent jurisdictions are described in sections II-B and III-A of the EIR. Lands within the City of Indio are described in particular on page III-7 of the EIR, and provide sufficient description to characterize land use patterns in the area.

AA.3. Comment: Traffic impacts upon the City of Indio including impacts upon such major north/south roads as Jefferson, Madison, Monroe, Jackson, Calhoun and Van Buren which provide the most direct access to both Highway 111 and the I-10 freeway and all of the inter-related intersections thereto resulting from the potential of 80,000 new dwelling units rather than 66,000 dwelling units identified in the DEIR.

Response: Comment noted. Traffic impacts, including regional traffic impacts, are described on pages III-38 through III-48, as well as in Appendix F of the EIR. The methodology used to quantify potential dwelling units is clearly described on page III-3 of the EIR. The accurate number of potential units is 66,000, not the 80,000 estimated by the commentor. Also see response to comment AA.11., below.

AA.4. Comment: Traffic impacts upon the City of Indio including impacts upon such major east/west roads as Avenue 52, Avenue 50, Avenue 49, Avenue 48, Highway 111, Miles Avenue, Fred Waring Drive and all of the inter-

related intersections thereto resulting from the potential of 80,000 new dwelling units rather than 66,000 dwelling units identified in the DEIR.

Response: Comment noted. See response to comment AA.3., above.

AA.5. Comment: Cumulative impacts upon all areas of sensitivity to thresholds including mitigation measures, public improvements and other financial offsets for enhanced infrastructure of affected public agencies necessary to properly mitigate the significant impacts.

Response: Cumulative impacts are addressed in Section VIII of the EIR.

AA.6. Comment: Consideration of reasonable municipal service agency alternatives to the project including leaving the area within the City of Coachella Sphere of Influence, placing the area into the City of Indio's Sphere of influence, creation of a Vista Santa Rosa Municipal Advisory Council under the jurisdiction of the County of Riverside or the incorporation of a city of Vista Santa Rosa.

Response: Comment noted. CEQA does not require the "consideration of reasonable municipal service agency alternatives." Such consideration is the responsibility of the Local Agency Formation Commission.

AA.7. Comment: In other instances, the DEIR contains summary and conclusionary statements that are not supported by any information, documentation or analytical data.

In determining the proper scope of an EIR, it is necessary to consult with the appropriate agencies, municipalities, and public who will be impacted by the proposed actions. Because a portion of the area being considered for annexation and a sphere-of-influence amendment currently lies in the city of Coachella's sphere-of-influence and the fact that both cities of Indio and Coachella would bear impacts from buildout of the proposed General Plan, the absence of a "Notice of Intent to Prepare an EIR" to the City of Indio has resulted in a void of information relative to impacts upon the City of Indio. Traffic, noise, land use, and water resource impacts upon the City of Indio were not fully analyzed or disclosed in the DEIR. It should be noted that the City of Indio was not sent a Notice of Preparation (NOP) for the DEIR. It is unclear to us whether such notice was overlooked with the City of Coachella – and if it was, there may be additional shortcomings in the DEIR.

Response: The commentor is incorrect. The Notice of Preparation (NOP) was sent to the City of Indio on 4/17/01, UPS tracking #IZ84E 022 03 1003 270

3. It was delivered 4/18/01, 12.09 p.m., and signed Ramsey. The City of Indio did not respond to the NOP.

All regional issues, including traffic, have been fully analysed in the DEIR. As a Program EIR, the document does not analyse individual project impacts, not does it preclude such analysis under CEQA in the future.

AA.8. Comment: Although the document contains a substantial amount of information, the DEIR is inadequate since it fails to fully analyze the General Plan's impact on several environmental categories including mineral resources, hazards and hazardous materials, and parks and recreation. These categories were identified in the Initial Study as less than significant and potentially significant. This is very questionable since the buildout will add about 66,811 new dwelling units (see comment below regarding the potential maximum buildout). All of the environmental categories identified above that have been excluded in the DEIR are required to be analyzed in EIRs for general plans.

Response: The commentor is incorrect. The potential impacts associated with mineral resources and hazardous materials are both identified as less than significant in the initial study (see Appendix A, DEIR). The General Plan clearly states that mineral resources do not occur within the planning area (General Plan, page 52). The issues associated with land use compatibility and hazardous materials are addressed in Section III-A of the EIR. Finally, parks and recreation are addressed in the General Plan Parks and Recreation Element, pages 45 through 48. Since the General Plan and associated Master Environmental Assessment identify a need for 3 acres of park land for every 1000 residents, and policy in the General Plan establishes that standard, no mitigation is needed.

AA.9. Comment: The DEIR fails to include an accurate project description. In particular, the DEIR ignores the fact the area being considered for annexation and sphere-of-influence amendment is currently in the City of Coachella's sphere-of-influence. This oversight is significant for all parties involved (citizens and property owners in surrounding areas, investors/developers, affected public agencies) in the decision making process regarding this very important land resource opportunity. All members of the public are owed a reasonable description and comparison analysis of all options in analyzing your proposal. In fact, one of the actions necessary to achieve the project's end result is a LAFCO Sphere of Influence Amendment by the City of Coachella deleting a portion of their SOI.

Response: The City is aware that approximately 3,200 acres of the planning area is located in the Sphere of Influence of the City of Coachella. A Sphere of

Influence, however, is advisory only, and can be amended by action of LAFCO. The project description is located on pages I-4 through I-29. In order to clarify the issue for the commentor, the second paragraph of page I-9 is amended as follows:

“The General Plan planning area consists of 53,498± acres, including 20,254± acres in the City limits, and 33,244± acres in the sphere-of-influence and lands outside the sphere and within the planning area. Approximately 3,200 acres of the planning area, generally located north of Airport Boulevard and East of Monroe Street, are located within the City of Coachella’s Sphere of Influence....”

The EIR addresses only the CEQA analysis for any potential change in boundary to the City of La Quinta or the City of Coachella. The LAFCO process will include additional analysis and a number of public hearings, should an application be filed by the City of La Quinta. The inclusion of 3,400 acres of the planning area in the City of Coachella’s Sphere of Influence does not represent a potentially significant impact under any mandated CEQA analysis category.

AA.10. Comment: The DEIR fails to provide any thresholds of significance as a baseline for determining whether the impact for each of the issue areas is significant.

Response: Where appropriate and available, thresholds of significance have been identified in the EIR, including but not limited to air pollution emission standards, traffic levels of service, noise standards, public facility capacity standards, and impacts to cultural and biological resources. These standards are discussed in the appropriate section of section III of the EIR.

AA.11. Comment: The analysis in the DEIR underestimates the impacts of buildout of the proposed General Plan and the proposed annexation and sphere-of-influence amendment areas on the adjacent cities of Indio and Coachella. This is especially apparent in the impact analysis for public services and utilities. The DEIR uses 2.75 persons per household to determine the impacts. This number is considerably lower than the household size figures used by the California Department of Finance (3.263 persons per household), and the Southern California Association of Governments (3.24 persons per household – 2005 and 3.14 persons per household - 2020). The DEIR’s low household size figure is used throughout the analysis, significantly underestimating the impacts of the buildout of the General Plan on all public services and utilities by 20 percent – that is as much as 13,362 additional household and dwelling units.

Response: As cited in the EIR, the data regarding the persons per household was provided by Claritas, Inc., a well respected market data provider, based on actual households in the planning area, not on populations in any of the surrounding cities. The Claritas estimate represents a more accurate per household population count for the planning area, and was therefore utilized in the EIR. Estimates of impacts are not under-estimated.

AA.12. Comment: Alternative analysis in the DEIR is inadequate because it does not comply with CEQA's requirement to provide alternatives that substantially lessen or avoid environmental damage. Instead, the DEIR presents a "more intense development scenario" which does not lessen or avoid environmental damage and has impacts greater than General Plan buildout.

Response: The commentor is incorrect. The alternatives selected include both a less intense and more intense alternative. The less intense alternative clearly demonstrates how impacts would be lowered if densities were to be reduced. The more intense alternative does meet the requirements of CEQA, insofar as it identifies potential impacts associated with the project if principles associated with the elimination of urban sprawl were implemented. These principles include intensified land use densities for residential development, permitting a larger population in a smaller area, and locating commercial opportunities to serve these areas within short distances. The intent of this alternative was to examine whether it could achieve less significant impacts if implemented. Although some of the impacts associated with this alternative may be greater than the recommended alternative, its analysis was still appropriate as part of Section V of the EIR.

AA.13. Comment: Besides containing substantial errors in forecasting impacts, the DEIR also lacks consistent application of the cumulative impact analysis, especially as it pertains to the proposed annexation and sphere-of-influence amendment. Time and time again, the cumulative impact analysis of an environmental category consists of a brief, superficial discussion that is factually lacking.

Response: Please see response to comment AA.11., above. Section 15130(b) of the CEQA Guidelines states:

"The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone."

The discussion contained in Section VIII of the EIR accomplishes this goal, and references other portions of the document where regional issues have been identified. The document adequately addresses cumulative impacts.

AA.14. Comment: In sum, the DEIR discounts or entirely ignores many significant, adverse environmental impacts associated with buildout of the General Plan and the proposed annexation and sphere-of-influence amendment areas. An EIR must be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to take necessary and appropriate actions. The DEIR's analysis of the project's impacts fails this test, being seriously misleading and inaccurate.

Response: Comment noted. The EIR provides sufficient information, whether in the text itself or in the attached and referenced Appendices to meet or exceed the requirements of CEQA.

AA.15. Comment: The following is a list of some of the deficiencies in the DEIR. We conclude that the DEIR is inadequate in its present form and that the DEIR requires additional information and analysis of such substantial nature that it cannot be completely corrected by simply responding to the comments which follow. The additional information, needed for the Riverside County LAFCO to make an informed and intelligent decision in accordance with CEQA guideline, is so extensive as to justify additional peer review by recirculating the EIR as a draft for public review. Prior to recirculating the EIR, the issues raised in these comments need to be fully addressed. Without the benefit of peer review, the information presented to LAFCO will contain many of the flaws identified below.

Response: Comment noted. See response to comment AA. 14., above.

AA.16. Comment: Page 1-4 Project Description

The project description does not disclose that a substantial portion of the area being considered for the proposed annexation and sphere-of-influence amendment is currently in the city of Coachella. Rather, the DEIR addresses the City, its SOI and land outside the SOI. While the existing City area encompasses 31 square miles; existing SOI area include another 2.7 square miles; the area outside the SOI encompasses an additional 49 square miles. Clearly the preponderance of the area reported in the DEIR is located outside the City of La Quinta Sphere of Influence and yet the level of information provided for this area is described at best, as being "broad." Perhaps a better term might be to

describe the DEIR's description and analysis of this area outside the SOI is "vague."

Response: See response to comment AA.9., above. The project description includes acreage calculations for each of the areas addressed, descriptions of the proposed land uses under the recommended alternative, and descriptions of the land uses under the current County of Riverside General Plan. The project description also includes summaries of all environmental affected areas, and provides an extensive discussion of the issues to be addressed in the document. It is more than adequate to meet the requirements of CEQA.

AA.17. Comment: Page 1-9 Existing Land Uses

There is a discrepancy between the number of acres and dwelling units disclosed in the second and third paragraphs, and those shown on Tables I-1 and I-2. Normally, this would be a simple mathematical error that could be easily corrected. However, it may be indicative of a common and critical error in this document, i.e. making incorrect mathematical forecasts for critical issues.

Response: The commentor is incorrect. The data provided in the discussion on page I-9 is clearly labeled "Existing Land Uses." Tables I-1 and I-2 are clearly labeled "General Plan Recommended Alternative," under the General Plan Land Use Summary discussion. The text and tables referenced by the commentor, therefore, do not correlate.

Should the commentor wish to compare the text on page I-9 to the tabular summaries provided in the EIR, he should reference Table III-1, labeled "Current General Plan."

AA.18. Comment: Page I-10

The second paragraph refers to the properties within the jurisdiction of the City of Indio. It is a general description that offers an inaccurate depiction of what exists and planned for areas critically close and adjacent to the proposed Sphere of Influence amendment area. In particular, existing land uses located in the two square mile area bounded by Avenue 52 on the south, Madison and Jackson Streets on the west and east, and Avenue 50 on the north are oriented around major equestrian facilities including the empire Polo Ground, the El Dorado Polo Grounds and the Horses in the Sun (HITS) equestrian facilities. These land use activities are core equestrian facilities that have resulted in the establishment of very significant equestrian investments for the area, including new estate sized lots and housing with equestrian

permitted accessory uses. In addition, the area immediately north of Avenue 50 is also zoned and used for equestrian oriented single family residential properties.

The Indio General Plan and zoning for these areas (Country Estates Indio Ranchos zoning and Indio Ranchos Polo Estates Specific Plan) recognize existing land uses and projects future land use policy to be an equestrian nature. To ignore their presence in and around this portion of the Vista Santa Rosa community would be a disservice to both existing and future landowners of the area; not to mention the land use ramifications of non-equestrian properties locating nearby equestrian oriented activities such as these. It would seem “good planning” to build upon the equestrian orientation that is being pursued by both the City of Indio and the Vista Santa Rose (sic) community.

Response: Comment noted. The second paragraph on the referenced page, after identifying lands under the City of Indio’s jurisdiction, lists a number of land use designations, taken directly from the Indio General Plan. The first land use designation listed is “country estate residential.” The paragraph goes on to list a number of other land uses which occur in Indio’s jurisdiction. The paragraph provides an overview of Indio’s land use designations.

The General Plan places an Agricultural Overlay on the lands referenced by the commentor. The overlay clearly states that existing land uses are permitted to continue in perpetuity, and can be developed at a density of up to 4 units per acre if the landowner so chooses. The General Plan does not eliminate the existing development pattern in the area, and in fact preserves the existing lifestyle. Furthermore, lands within the County of Riverside at the southeast corner of Avenue 50 and Jackson are currently designated for 2 to 5 units per acre, as are lands on the south side of Avenue 52, east of Madison Street within the existing City limits.

A mix of densities, and the options available to land owners to maintain equestrian or agricultural facilities for the long term, has been identified and addressed in the EIR.

AA.19. Comment: Page I-12

On Table I-1, two columns of information are reported: “City of La Quinta” and “Sphere/Planning Area.” The latter column groups together the land area currently in the City of La Quinta’s Sphere of Influence and the land area currently in the City of Coachella sphere of influence. The table needs to be enlarged to accommodate a split of the latter

category into two distinct categories for analysis to better enable the reader the opportunity of comprehending and assessing the issue of deleting the 19,619 acres from the Coachella SOI and placing that area or a portion thereof into the La Quinta SOI.

Response: The commentor is incorrect. The area currently within the City of Coachella Sphere of Influence represents approximately 3,200 acres, not 19,619 acres. The Table differentiates between lands within the City's jurisdiction, and lands outside its jurisdiction. Further breakdowns are not necessary to adequately address issues in the EIR.

AA.20. Comment: Page I-13

On Table I-2, what is the land use buildout for the City of La Quinta, the proposed annexation area, the sphere-of-influence amendment area, and the remaining planning area? In the Office category as well as the Commercial and Industrial subtotals, there are many typographical errors which makes (sic) it difficult to distinguish the correct buildout numbers for Office, Commercial and Industrial land uses. What is the correct buildout for Office? What are the correct Commercial subtotal (sic)? What are the correct Industrial land uses? This could be an easily corrected simple error. However, it is indicative of a pattern of errors in this document that includes providing incorrect information for critical issues.

Response: There is one typographical error in Table I-2, involving an untabbed number in the first column on the left, under the Office category. The numbers elsewhere in the table are correct. The commentor may also review the individual categories in Tables III-3 and III-4.

AA.21. Comment: Page I-19 and I-20

On Tables I-4 and I-5, what are the existing land uses (not the existing General Plan designations) for the proposed annexation area, sphere-of-influences amendment area, and the remaining planning area? How many acres of the proposed annexation, sphere-of-influence, and remaining planning area are currently being used for agricultural (sic)? Classifying their existing land uses as either "very low density or low density" is misleading and incorrect.

Response: The discussion of surrounding land uses is contained in Section II-B and Section III-A. Table III-1 on page III-5 shows that 16,152 acres designated Agriculture under the County General Plan are currently developed.

AA.22. Comment: Pages I-20 and I-21

The discussion regarding residential land uses is also misleading and incorrect. What are the existing residential land uses? How many dwelling units and residential acres are currently in the city of La Quinta, the proposed annexation area, the sphere-of-influence amendment area, and the remaining planning area? What information and methodology have been used to derive the assumption of “75 percent of the maximum densities permitted”? How many acres of “residential development” are currently being farmed or used for agricultural (sic)?

Response: Regarding existing land uses, please see response to comment AA.21., above. Existing dwelling units are listed in Table III-1. As regards the residential calculations, it was assumed that 25% of an acre would not be available for the construction of housing units. The assumption is made that 25% of an acre, on average, is developed for streets, parkways and similar facilities. The assumption was based on the writer’s experience with development in the Valley as a whole, and a comparison of development trends in the City of La Quinta in particular. Regarding land in agriculture, please see response to comment AA.21., above.

AA.23. Comment: Page 1-22 and 23

There is no mention that a portion of the area within the proposed annexation and sphere-of-influence amendment is currently within the sphere-of-influence for the city of Coachella. How many acres of the proposed annexation and the sphere-of-influence amendment areas are in Coachella’s existing sphere-of-influence? How many acres of Coachella’s existing sphere-of-influence are currently used for agricultural? What is the average household size for the proposed annexation and the sphere-of-influence amendment areas according to the 2000 Census? What information and methodology have been used to derive the household size of 2.75 persons per household? This is lower than the figure used by the California Department of Finance and SCAG.

Response: Please see responses to comments AA.9., AA.11. and AA.19., above.

AA.24. Comment: Page I-25

Information provided in the first and second paragraphs regarding the number of acres designated for Very Low Density Residential (7,089 vs. 6,280) and Low Density Residential (22,705 vs. 11,335) is not consistent with the numbers shown on Table I-1. Why is there an (sic)

discrepancy? How many acres are going to be (sic) designated as Very Low Density and Low Density Residential?

Response: The commentor is incorrect. The discussion on page I-25 relates to lands in either the Very Low Density or Low Density categories which also have the Agricultural Overlay. The data provided in Table I-1 includes all lands in each of the two categories.

AA.25. Comment: Page I-27

Impacts on water resources are one of the many critical components in the DEIR where impacts have been vastly underestimated. If the population is underestimated, then water usage is underestimated. How was the low household size of 2.75 persons per household derived when the California Department of Finance and SCAG have projected household size to be 3.2 and above? What are the assumptions and methodologies used to come up with 2.75 household figure? How is it determined that only 75 percent of the residential lands would have maximum densities permitted? How was the population figure of 207,970 derived? According to Table I-2, at buildout, the General Plan will result in 78,952 dwelling units. Using the low household size of 2.75 persons per household, the population generated is 217,118 persons, not 207,970 persons as disclosed in the DEIR. Normally, this would be a simple mathematical error that could be easily corrected. However, it may be indicative of a common, and critical error in this document, that includes making incorrect mathematical forecasts for key issues.

Response: See responses to comments AA.11., A.22., above. The paragraph referred to by the commentor clearly describes how the buildout population was derived: The number of new dwelling units is multiplied by 2.75, for a subtotal of 183,730. 183,730 is added to the existing population of 24,240, resulting in a total population of 207,970. It would be inappropriate to multiply the total number of units at buildout by the 2.75 household size, since the existing population is known.

AA.26. Comment: Page II-1

What are the existing land uses (not the existing General Plan designations) for the City of La Quinta, the proposed annexation area, sphere-of-influence amendment area, and planning area? How many dwelling units and what type of dwelling units (single family vs. multi family, seasonal, low income housing) in La Quinta, the proposed annexation area, sphere-of-influence amendment area and remaining portion of the planning area? How many square feet of commercial and

industrial uses are in La Quinta, the proposed annexation area, sphere-of-influence amendment area, and remainder of the planning area? How many acres of parks and open space exist? How many acres and square feet of public/quasi-public facilities currently exist? How are (sic) many acres are currently in agricultural production? Why was there no mention of the fact that a substantial portion of the area of the proposed annexation and sphere-of-influence areas are currently in the city of Coachella's sphere-of-influence?

Response: See responses to comments AA.9., AA.21. Existing and projected units and square footage are contained in table III-1 on page III-5, as well as Tables III-2, III-3, III-4, III-5, 111-6, III-7 and III-8.

AA.27. Comment: Page II-2 Existing Land Uses

Why is there such a large discrepancy between the information provided in the discussion of the existing land uses and the information provided on Table I-1?

Response: The commentor is incorrect. The discussion on page II-2 refers to existing land use and General Plan designations, while Table I-1 refers to the Recommended Alternative land use plan. The discussion and Table are therefore not directly related.

AA.28. Comment: Page II-2 Surrounding Land Uses

The information provided in the DEIR is inadequate regarding surrounding land uses in Indio and Coachella. Where are Indio and Coachella's residential, commercial, and industrial areas in relationship to the proposed General Plan, annexation area, and sphere-of-influence amendment area? Where are the potential land use conflicts?

Response: See response to comment AA.18. Surrounding land uses are described on pages III-6 and III-7 for the entire planning area. Lands within and adjacent to the annexation area are described on page III-14-17. Lands within and adjacent to the sphere of influence amendment area are described on pages III-18-20.

AA.29. Comment: Page II-3

The DEIR downplays the fact that approximately 40 percent of the existing area (19,938 acres) in the General Plan which is currently used for agricultural purposes will be converted to urban development. What are the potential land use conflicts between proposed residential developments and existing agricultural operations? What about

potential conflicts with surrounding equestrian properties to the north in the City of Indio? The close proximity to the Polo Grounds and the Desert HITS facilities?

Response: The discussion of impacts to agricultural resources is contained in Section III (“Existing Environmental Conditions, Project Impacts, and Mitigation Measures” [emphasis added]), subsection B., Agricultural Resources, pages III-21 through III-29. This section includes discussion of the urbanization of the area as a whole, not the impacts to specific projects. This section clearly states that the urbanization of this area will have a significant impact on the character of the area in the long term, although this impact is highly dependent on the rate at which development occurs.

Lands in the City of Indio are currently developed as polo facilities, but are designated “Country Estates,” a designation which allows up to 3.5 units per acre. Furthermore, since these polo facilities are in RPD overlays in the Indio General Plan, densities of 6 to 10 units to the acre are allowed. Since the densities proposed in both the annexation area and the sphere of influence amendment in the La Quinta General Plan are Low Density Residential, Up to 4 units per acre, the land use designations and ultimate buildout are likely to be similar.

AA.30. Comment: Page II-6

The majority of the planning area is located in a high liquefaction hazard area. This needs to be identified in the existing setting as well as identified as an issue of future analysis and mitigation.

Response: Paragraph 3, page II-6 states:

“Issues associated with these geotechnical conditions include ground shaking, liquefaction, rock falls and landslides...” (emphasis added).”

The impacts and mitigation measures associated with geological hazards are contained on pages III-61 through III-78.

AA.31. Comment: Page II-13

Domestic Water

No mention is made of the serious groundwater overdraft situation in the Coachella Valley or that the amount of water which is being pumped in the Colorado River to recharge the areas is being reduced. There is also no discussion of the subsidence caused by the groundwater overdraft situation. There is no information provided regarding how much growth

the Coachella Valley can support in the future and whether the development being proposed by the General Plan can be facilitated and by what means or costs to other existing development policies.

Response: The commentor is incorrect. The last sentence of the paragraph referred to by the commentor states:

“Currently, the groundwater resource is in an overdraft condition.”

Section II of the EIR provides a brief environmental setting discussion. The complete discussion of water resources, including discussions of recharge, growth rates and subsidence, are contained in Section III, subsection F., pages III-87 through III-95.

AA.32. Comment: Wastewater Treatment

No information is given as to the current capacity of wastewater treatment facilities that will be serving the planning area and whether they can support the additional development from the proposed General Plan at buildout; or a phasing plan implementation.

Response: Section II of the EIR provides a brief environmental setting discussion. The complete discussion of wastewater treatment is contained in Section III, subsections F. and L, and includes description of existing and planned facilities and planned capacity enhancements which will double the capacity of the Madison and Avenue 38 plant, and increase the capacity of the Mid-Valley Reclamation Plan by 20 percent in the next year.

AA.33. Comment: Solid Waste

No information is provided as to the capacity of the landfills that will be servicing the planning area and whether the landfills can accommodate projected development.

Response: Section II of the EIR provides a brief environmental setting discussion. The complete discussion of solid waste is contained in Section III, pages III-177-180.

AA.34. Comment: Page III-2

The DEIR does not provide any information regarding existing land uses within the proposed General Plan area. How many dwelling units and type of dwelling units (single family vs. multi family, seasonal, low-income housing, equestrian oriented) in the City of La Quinta, the proposed annexation area, sphere-of-influence amendment area, the

adjoining areas in the City of Indio and the remaining portion of the planning area? What is the comparative assessment between existing residential, current land use policy and what is being proposed? How many square feet of commercial and industrial uses are in La Quinta, the proposed annexation area, sphere-of-influence amendment area, and the remainder of the planning area? What is the difference between existing commercial/industrial land uses and what is proposed? How many acres exist or are proposed for public parks and recreation areas? How will General Plan buildout impact public parks and recreation areas? How many acres and square feet of public/quasi-public facilities now exist, and how many are proposed? How many agricultural acres will be lost to urban development as proposed by the General Plan?

Response: See response to comment AA.21 and AA.26., above.

AA.35. Comment: Page III-3

How was it established that only 75 percent of the residential lands would have maximum densities permitted? What are the methodology and information used to substantiate the 75 percent assumption? How did the analyst derive a 22 percent lot coverage assumption for buildout of commercial use? What are the methodology and information used to substantiate commercial lands? How did the analyst derive a 34 percent lot coverage assumption for buildout of industrial uses? What are the methodology and information used to substantiate the industrial lands assumption? How do these assumptions differ from what is currently happening in the Coachella Valley?

Response: As regards the residential land use assumptions, see response to comment AA.22., above. The assumptions for commercial and industrial square footage are based on floor area ratios, the need for parking and landscaping areas, and typical development in and around the City of La Quinta, which results in the referenced lot coverages.

AA.36. Comment: Page III-4

Exhibit III-1 does (sic) not distinguish between Agricultural and Very Low Density residential land uses. According to the DEIR, 19,938 acres currently are designated Agricultural. There is a significant difference between the two land uses, and this difference needs to be shown. Also, there is no indication that the proposed annexation and sphere-of-influence amendment areas currently are in the city of Coachella's sphere-of-influence. In addition, there is no indication of what the existing land uses are for the adjacent jurisdictions affected by the proposed General Plan. Exhibit III-1 needs to be corrected to show the

difference between the Agricultural and Very Low Residential land uses, Coachella's existing sphere-of-influence, and existing land uses for adjacent jurisdictions (cities of Indio and Coachella).

Response: Comment noted. The breakdown between Agricultural and Very Low Density Residential requested by the commentor is displayed on the following page, in Table III-1. Land uses in adjacent jurisdictions are described in Section II and Section III-A. As regards the Sphere of Influence, and has been previously stated, 3,200 acres located between Monroe and Van Buren, Airport Boulevard and Avenue 52 are currently in the City of Coachella Sphere of Influence.

AA.37. Comment: Page III-5

Why are there inconsistencies between Table III-1 (Current General Plan – Land use Buildout Statistical Summary) and Table I-1 and I-2? Table III-1 states that there are 19,938 acres of Agriculture (1du/10acres), out of which 16,132 acres are designated for urban development. Why are there no existing dwelling units listed for these urban areas? Also, there lacks mention in either Tables I-1 or I-2 of agricultural land, when Table III clearly states that 16,132 agricultural acres are set aside for urban development. Thus, the sub-totals for each of the categories on Table III-1 are in conflict with those in Tables I-1 and I-2.

Response: The commentor has misinterpreted the data. Table III-1 represents the land use designations under the existing general plans for the City and surrounding jurisdictions. The Developed Acres column represents land on which development occurs, regardless of whether that development is urban or agricultural. Tables I-1 and I-2 represent the Recommended Alternative statistical summary. Existing dwelling units are grouped together for all single family and multi-family units, since the Department of Finance does not assign units by land use designation. The asterisks in all three referenced tables cite that item specifically. Tables I-1 and I-2 reference the proposed land uses, and therefore do not include the agricultural land use designation. There is no conflict between the referenced Tables.

AA.38. Comment: Page III-10, fourth paragraph

The DEIR does not address land use impacts on adjacent jurisdictions, which contain rural residential agricultural, and private recreational areas. The higher residential densities and assignments proposed by the General Plan would be incompatible with adjacent jurisdictions' land uses and could create significant impacts.

Response: See response to comment AA.18., above. High density residential is not proposed adjacent to other jurisdictions anywhere in the planning area.

AA.39. Comment: Page III-13

What methodology and approach have been utilized to assess land use impacts resulting from buildout of the proposed General Plan? What threshold of significance was used to evaluate land use impacts?

Response: Land use impacts were reviewed based on density comparisons, built versus vacant land, and development patterns in an area. The criteria include quantitative analysis of existing development, surrounding land use designations, and the location of land on major roadways, adjacent to public facilities or open space, etc. Also see response to comment AA.10., above.

AA.40. Comment: Summary of Impacts

No information or analysis is provided regarding land use impacts on adjacent jurisdictions. The majority of the proposed annexation and sphere-of-influence amendment areas currently are in agricultural use. The proposed General Plan would designate these areas for residential development with no transitional land to buffer the existing agricultural operations. This would cause significant land use impact.

Response: Land use impacts were not identified for adjacent jurisdictions, since the land use pattern proposed in the General Plan is similar to that in adjacent jurisdictions, and since the Agricultural Overlay allows the continuation of agricultural and equestrian activities in perpetuity. Issues associated with buffering and the interface between agricultural and non-agricultural uses are addressed in Section III-B, page III-28.

AA.41. Comment: Page III-14

How many acres within the proposed annexation area currently are used and designated as either Agricultural or Very Low Density Residential?

Response: As stated on the referenced page, 3,782 acres are designated for Agriculture or Very Low Density Residential currently.

AA.42. Comment: Page III-15

The city of Coachella's current sphere-of-influence should be designed on Exhibit III-3.

Response: Comment noted.

AA.43. Comment: Page III-17

No information is provided in the DEIR identifying land uses in jurisdictions adjacent to the proposed annexation area. The majority of the adjacent land uses are agricultural. The proposed General Plan would designate areas currently used for agriculture to urban development. This could result in significant land use incompatibilities.

Response: See response to comment AA.18., above.

AA.44. Comment: Page III-18

In the proposed sphere-of-influence amendment area, the DEIR fails to specify the number of acres currently used for agricultural, nor does it identify land uses in jurisdictions adjacent to the proposed amendment area. How many acres in the proposed sphere-of-influence area support agriculture? The proposed General Plan would change land currently designated for agriculture to urban use. This would result in significant land use incompatibilities with existing and adjacent land. Again, the DEIR fails to mention that the proposed sphere-of-influence amendment area currently is in the city of Coachella's sphere-of-influence.

Response: The commentor is incorrect. Page III-27 of the EIR states:

“Approximately 5,651 acres of the proposed SOI area are designated for Agriculture/Very Low Density Residential development under the existing Riverside County General Plan.”

See responses to comments AA.18., and AA.40., above.

AA.45. Comment: Page III-20

The majority of the proposed sphere-of-influence area and adjacent land uses currently support agricultural operations. The proposed General Plan would designate an area currently used for agriculture to urban development. This would create significant land use incompatibilities with existing adjacent land uses.

Response: Comment noted. Agricultural Resources are addressed in Section III-B, pages III-21 through III-29. This section discusses the direct and indirect impacts associated with urbanization of the area. It also includes mitigation measures, including buffer areas between these land uses. At the hearings held by the Planning Commission and City Council in

September, November and December, 2001, additional zoning standards, including right to farm provisions and notification of land buyers was also presented, and will be incorporated into the Municipal Code amendments which will be processed by the City after adoption of the General Plan. In addition, the City's Transfer of Development Rights provisions (Section 9.190) shall be considered for inclusion in the Agricultural Overlay district, thereby providing an incentive for the long-term preservation of agricultural parcels in the planning area.

AA.46. Comment: Page III-22

The DEIR states that the County Agricultural Resource Map shows a combined total of 28,657 acres of Prime Farmland or Farmland of Statewide Importance exist within the planning area. This conflicts with the 19,938 total agricultural acres presented on Table III-3. Why is there a discrepancy between Table III-3 and the discussion Section of the DEIR? How many acres of productive agricultural land currently are in the planning area?

Response: As stated on the referenced page, the County General Plan map represents an over-statement of lands available for agriculture, since it was prepared in 1993, and the County has since approved projects such as the Village at the Palms, Coral Mountain Specific Plan, the Kohl Ranch Specific Plan, and scattered residential development in the area. Also as stated on the referenced page, the Desert Resorts Airport is designated prime and statewide important farmland. The County map offers a guideline, but is inconsistent with the County land use plan.

AA.47. Comment: Page III-23

Williamson Act Contracts

The DEIR fails to identify parcels currently under Williamson Act contracts. What are the proposed land uses according to the General Plan?

Response: The last sentence on the referenced page states:

"There are currently a total of 5,411.99 acres of land under Williamson Act contracts within the planning area." As a Program EIR, it is not necessary to identify individual parcels. Finally, in order to receive Williamson Act benefits, the land must be in agriculture. The land uses proposed under the Recommended Alternative would be Low or Very Low Density Residential, with an Agricultural Overlay.

AA.48. Comment: Page III-24

What were the methodology and approach taken to assess agricultural impacts resulting from buildout of the proposed General Plan? What was the threshold of significance for evaluating the impacts on agricultural lands? The DEIR should utilize the LESA methodology recommended by State Department of Resources (sic).

Response: Comment noted. Section III-B identifies agricultural lands both in use and designated, The methodology used to determine the potential impacts included analysis of Williamson Act contracts, and the ultimate buildout of the General Plan under the Recommended Alternative. The EIR determined that the potential impacts to agricultural resources would be significant, even with mitigation. The LESA methodology would be appropriate for project specific reviews, should land currently designated Agriculture be annexed into the City.

AA.49. Comment: Agricultural Land Use Impacts

In Table III-9, the DEIR states that a total of 19,938 acres are in agricultural production and recommends 17,615 acres be designated as low-density residential with an agricultural overlay. What will the remaining 2,323 acres of agricultural lands be designated? How many acres of State Prime Farmland or Farmland of Statewide Important would be designated for residential land uses? How many agricultural acres under the Williamson Act contracts would be designated for non-agricultural uses?

Response: The EIR states:

“The remaining 2,323 acres, which are currently designated for Agricultural uses in the County General Plan, are not included in the proposed Agricultural Overlay. These lands generally occur immediately adjacent to existing City limits, and in the Coral Mountain and Kohl Ranch Specific Plans...”

The Recommended Alternative land use designations do not include an agricultural land use designation. Therefore, all lands currently affected by Williamson Act contracts would be assigned non-agricultural land use designations. Lands developed in agriculture or equestrian uses in the Agricultural Overlay will be allowed to continue as conforming uses in perpetuity, should they be annexed.

AA.50. Comment: The DEIR fails to acknowledge that buildout of the proposed General Plan would convert prime Farmland and Farmland of Statewide Importance to non-agricultural uses; therefore a significant impact will result.

Response: Page III-28 states:

“Even with implementation of mitigation measures, the impacts associated with long term loss of prime agricultural lands will be significant.”

AA.51. Comment: Page III-35

What are the existing average daily traffic (ADT) volumes for the proposed annexation, sphere-of-influence, and the remaining planning area? No information is provided in the DEIR. Also, no information is provided as to the existing Level of Service (LOS) and ADT for the areas that will be affected in the adjacent jurisdictions (cities of Indio and Coachella). Since the adjacent jurisdictions will be affected by General Plan traffic, existing traffic information is needed.

Response: The commentor is incorrect. Existing volumes to capacity ratios throughout the planning area are depicted in Exhibit III-4. This exhibit also includes roadways in adjacent jurisdictions. Levels of Service can be derived from this exhibit by using the data in Table III-10.

AA.52. Comment: Page III-36

Where are the routes for public transit services? What is the existing rider ship for public transit service? How many trains provide passenger service? Where is the train station in Coachella Valley, and how far is it from the proposed planning area?

Response: Public transit routes and the availability of a train platform in Indio are described on page III-36. Ridership of routes operated by SunLine vary from Line to Line. SunLine adds buses to lines which are heavily traveled. In addition, another train platform is located in Palm Springs. The vast majority of trains passing through the Valley carry freight.

AA.53. Comment: Page III-37

Are there bicycle and pedestrian facilities in La Quinta and the proposed General Plan area? If so, where are they located? Are there any plans for bicycle and pedestrian facilities? Are provisions made for electric golf carts?

Response: Bicycle and pedestrian facilities are described on page III-37. Trails of all types, both existing and proposed, are depicted in Exhibit III-10 of the General Plan. An extensive discussion of the City's proposed golf cart plan is included in the EIR, on pages III-44 through III-48.

AA.54. Comment: Page III-38

What methodology and approach have been utilized to assess traffic and circulation impacts resulting from General Plan buildout? What are the thresholds of significance for determining whether traffic impacts are significant?

Response: The methodology used is summarized in the EIR, page III-38, under the heading "La Quinta General Plan Transportation Model." A complete description of the model is included in Appendix F of the EIR. Levels of Service and volume to capacity ratios, and the City's policies regarding acceptable LOS, are used to determine significance.

AA.55. Comment: Page III-39

Level-of-Service on Roadway Segments

How many segments have a volume-to-capacity (V/C) ratio between 0.91 and 0.99? Where are those segments located? Are there any segments with a V/C ratio between 0.91 and 0.99 located in the adjacent jurisdictions?

Response: As stated on the referenced page, volume to capacity ratios are illustrated on Exhibit III-7. Monroe Street, north of Mile Avenue, is depicted as having a V/C ratio of 0.92. Harrison Street, north of Avenue 54, is depicted to have a V/C ratio of 0.91.

AA.56. Comment: Page III-40

What assumptions have been used for the traffic model? What assumptions were made regarding access to network roadways and actual impacts to capacity?

Response: Assumptions are summarized in the EIR, and included in their entirety in Appendix F of the EIR.

AA.57. Comment: Page III-43

Intersection Analysis

Which intersections located in adjacent jurisdictions will be impacted by traffic associated with General Plan buildout? Which intersections in Table III-14 are located in adjacent jurisdictions? The most direct lines of access from the proposed Sphere of Influence Amendment area and the I-10 freeway or Highway 111 are via Jefferson, Madison (along an uncompleted segment to the north), Monroe, Jackson, Calhoun and Van Buren. It is the City of Indio's contention that the addition of upwards of 80,000 new dwelling units will have significant impacts upon these and connecting roadways/intersections and will require mitigation if better alternatives are not pursued.

Response: Mitigation measures, including the recommended roadway classifications and cross-sections, are included in the EIR, pages III-48 through III-62. Since the CVATS model was used as the basis for the model, and the City of Indio participates in CVATS, the data provided by Indio to the Coachella Valley Association of Governments regarding roadway classifications within its jurisdiction are included in the model, and therefore reflected in the EIR and Appendix F.

AA.58. Comment: Summary of Roadway Impacts

What are the ADT volumes projected to result from buildout of the Recommended Land Use alternative, and how will volumes affect circulation systems in adjacent jurisdictions? Your traffic analysis must identify the roadway segments in the adjacent jurisdictions that will likely operate with volumes exceeding their design capacities? And mitigation of such impacts is required.

Response: Roadway segments expected to exceed capacity are shown in Table III-13, page III-40. Post-2020 volumes throughout the region are illustrated on Exhibit III-7, page III-42. Levels of service at major intersections are listed in Table III-14, page III-43. Mitigation measures are listed on pages III-48 through III-60..

AA.59. Comment: Roadway Classifications

What are the existing roadway classifications and do they differ from those proposed? How do the proposed roadway classifications correspond to existing roadway classifications of adjacent jurisdictions?

Response: Roadway classifications are depicted in Exhibit III-11, and illustrated in Exhibit III-12. There are no significant changes to the roadway classifications in the 1992 General Plan.

AA.60. Comment: Page III-58

Which mitigation measures address traffic impacts on adjacent jurisdictions?

Response: The mitigation measures involving outside agencies name those agencies when necessary. These include mitigation measure B., and mitigation monitoring program C.

AA.61. Comment: Page III-72

Project Impacts

What methodology and approach were used to assess soils and geological impacts resulting from the proposed General Plan? What thresholds of significance were used to determine whether impact (sic) on soils and geological (sic) are significant?

Response: As cited on page III-61, the Soils and Geology section of the EIR is based on the Technical Background Report contained in Appendix G of the EIR. The standards utilized in the analysis are summarized in the EIR and described in their entirety in Appendix G.

AA.62. Comment: Page III-74

What are the wind erosion and blowsand impacts resulting from the construction activities associated with General Plan implementation?

Response: Wind erosion impacts are discussed on page III-72, third and fourth paragraphs.

AA.63. Comment: Page III-75

What assumptions have been used to determine that no substantial amount of development will occur within the proposed annexation and sphere-of-influence areas in the near future?

Response: Both the Annexation area and the SOI include a majority of lands which are developed (77% in the Annexation area, and 84% in the SOI). Since General Plan policies provide for the preservation of existing agricultural and equestrian facilities, and since those land owners have

vociferously expressed their wish to maintain their properties in their current condition at numerous public hearings on the General Plan, it is reasonable to assume that substantial development is unlikely.

AA.64. Comment: Page III-84

What methodology and approach were used to assess impacts on storm water run-off and flooding? What thresholds of significance were used to determine whether the proposed project would have significant impacts on hydrology? What are the storm water and flooding impacts resulting from the buildout of the proposed General Plan on adjacent jurisdictions (the cities of Indio and Coachella)? What mitigation measures will be taken to reduce storm water and flooding impacts on the adjacent jurisdictions?

Response: The Technical Background Report contained in Appendix G provides methodology for the development of the Hydrology section of the EIR. The City currently requires that projects retain 100 year storms on-site. Further, the City maintains a master plan of drainage, to which all projects must conform. These standards, combined with the mitigation measures contained in the EIR, are designed to reduce potential impacts within the City and on adjacent properties which may occur in another jurisdiction.

AA.65. Comment: Page III-91

What methodology and approach were used to assess impacts on groundwater resource in the Coachella Valley? What are the thresholds of significance used to determine whether the proposed project would have a significant impact on groundwater resources? What is the basis for the assumption of a 23 percent increase in commercial lands and a 43 percent increases for industrial lands stated in the DEIR.

Response: The sources of data in the Water Resources section of the EIR are cited in the document, and rely on documentation prepared by the Coachella Valley Water District. The methodology used to calculate the impact of General Plan buildout on water resources is described and detailed on page III-92. The increase in commercial and industrial development is cited in the document as “compared to the current General Plan,” and is primarily due to the increased planning area being studied in the Recommended Alternative.

AA.66. Comment: The DEIR assumes a low household size which underestimates water consumption impacts. This is especially apparent in the impact analysis for public services and utilities. The DEIR uses 2.75 persons per

household to determine impact. This number is considerably lower than the household size figures used by the California Department of Finance (3.263 persons per household) and the Southern California Association of Governments (3.24 persons per household in 2005 and 3.14 persons per household in 2020). The DEIR should be revised to reflect these updated household size assumptions to analyze water consumption and impact on groundwater resources resulting from the buildout of the proposed General Plan.

Response: See response to comment AA.11., above. Since the household size used is reflective of current conditions in the planning area, rather than statistical assumptions made by SCAG for other jurisdictions, it is an appropriate figure to use. There is no need to revise the calculations in the EIR.

AA.67. Comment: There is no impact analysis for the increase in water consumption of commercial and industrial land uses resulting from buildout.

Response: The commentor is incorrect. Paragraph three of page III-92 states:

“The Coachella Valley Water District estimates that domestic water demand in its urban service area is approximately 550 gallons per day (gpd) per capita. This is an aggregate figure that accounts for all water uses in the community, including residential, commercial, industrial, golf course, irrigation and other uses, and is not intended to represent a specific land use such as residential uses. This factor is used in the following analysis because it best reflects local water consumption conditions.”

AA.68. Comment: Page III-111

What methodology and approach were used to assess impact on biological resources resulting from the buildout of the proposed General Plan? What thresholds of significance establish criteria to determine whether the proposed project would have significant impacts on biological resources? Would the urban development proposed by the General Plan affect biological resources in adjacent jurisdictions?

Response: The Biological Resource section of the EIR is based on the assessment prepared by Dr. L. LaPre, which is summarized in the EIR and included in its entirety in Appendix C of the document. The methodology follows the requirements and standards established in the Endangered Species Act and the California Endangered Species Act, the most broadly accepted standards for biological resources.

The General Plan includes policies and programs which address individual species of concern which occur in the planning area, and provides for additional study as development occurs. In addition, the General Plan provides the Hillside Overlay for all properties above the toe of slope, which significantly limits the potential for development in the Santa Rosa and Coral Reef mountains.

AA.69. Comment: Page III-120

Where (sic) historic resources exist within the planning area? Which historic sites area on the State and National Registers? Are there any local historic resources?

Response: Historic resources are generally mapped on Exhibit 9.1 of the General Plan. A description of historic resources is included on page III-120 of the EIR. Sites of state, federal or local significance are listed on page III-120. Sites of local significance are also listed on this page.

AA.70. Comment: Page III-121

What methodology and approach were employed to assess impact on historic resources resulting from General Plan buildout? What are the thresholds of significance used to determine whether the proposed project would have significant impacts on historic resources? Which historic resource would be affected?

Response: The Cultural Resources section of the EIR is based on the cultural resource study prepared by CRM Tech for the General Plan update, and included in its entirety in Appendix B of the EIR. Impacts were assessed based on CEQA section 15064.5, which directly addresses impacts to cultural resources.

AA.71. Comment: Page III-132

What methodology and approach were used to assess air quality impacts resulting from the buildout? What thresholds of significance have been used to determine whether the proposed project would have significant air quality impacts?

Response: As stated in the EIR, all calculations relating to air quality are based on models developed by the South Coast Air Quality Management District (SCAQMD), which has jurisdiction over the Coachella Valley. All SCAQMD thresholds are included in the tables.

AA.72. Comment: Page III-138

What assumptions and information were used to determine the average trip length?

Response: The average trip length of 3 miles is based on buildout of the community, and assumptions made regarding typical distances in the area to work, shopping, school and recreation.

AA.73. Comment: Page III-139

What are the air quality impacts on adjacent jurisdictions? Are there any sensitive land uses within the adjacent jurisdictions which will be affected by carbon monoxide hot spots?

Response: Air quality is by definition regional. The significance of the impacts is defined by regionally established criteria. The air quality impacts associated with buildout of the General Plan are likely to be similar to those associated with buildout of adjacent jurisdictions, since the land uses proposed do not vary significantly from the development pattern currently occurring in the area. Whether a specific sensitive receptor in another jurisdiction will be affected by buildout of the cities of Indio and Coachella is dependent on the trip generation on any given street. The traffic and circulation states that no intersection will operate at a level of service below D. This represents an acceptable level, and limits the potential for carbon monoxide hot spots. Individual projects will continue to be reviewed for air quality impacts through buildout of the General Plan, and their impacts will be assessed as they occur.

AA.74. Comment: Page III-141

What air quality impacts on adjacent jurisdictions will result from buildout within the proposed annexation and sphere-of-influence amendments areas?

Response: See response to comment AA.73., above.

AA.75. Comment: Page III-149

Which computerized noise model was used and what were the assumptions? What are the thresholds of significance used to determine whether the buildout would have a significant noise impact? Where are the sensitive receptors? Are there any noise-sensitive land uses in the adjacent jurisdictions which will be affected by development?

Response: The description of the noise modeling for the proposed General Plan Update is provided in Appendix E of the EIR, including locations of modeled sensitive receptors. Residential units constructed on lands adjacent to major roadways in the City or planning area will be impacted by noise, as stated in the EIR. The EIR, however, also provides a number of mitigation measures which effectively lower the potential impacts of noise. Individual noise analysis for projects in the future will be required whether in the City or in an adjoining jurisdiction, if that jurisdiction, as a lead agency, determines that noise analysis is necessary.

AA.76. Comment: Page III-151

What was the basis for the assumptions regarding train trips and aircraft operations? What impact will the future train trips and aircraft operations have on proposed urban development? What assumptions were made regarding noise impacts generated from commercial and industrial development? How were noise impacts assessed? Where are sensitive receptors in relationship to planned commercial and industrial development?

Response: Assumptions regarding trains trips ,aircraft operations and commercial and industrial development are contained in Appendix E of the EIR. Impacts of those activities are summarized on pages III-51 through III-54, and contained in their entirety in the Appendix. The assumptions are based on growth projections provided by the rail and airport operators, respectively. Also see response to comment AA.75., above.

AA.77. Comment: Page III-155

What are the noise impacts on sensitive uses in adjacent jurisdictions resulting from buildout within the proposed annexation and sphere-of-influence areas?

Response: Noise impacts in the annexation and SOI areas are described on pages III-155 and III-156 of the EIR. Detailed modeling information is contained in Appendix E of the EIR.

AA.78. Comment: Page III-160

What methodology and approach were utilized to assess visual impacts? What thresholds of significance were used to determine whether the General Plan would have significant impacts on visual resources? Are there any view corridors that will be affected by proposed development?

Will scenic views from surrounding areas be affected by the proposed urban development?

Response: The visually valuable resources in the City and planning area are described on pages III-159 and III-160. The potential for view blockage of the mountains is the primary issue associated with buildout of the General Plan. There are no designated scenic corridors in the City. Impacts to resources are described on pages III-160 through III-162.

AA.79. Comment: Page III-162

The urban development proposed within the annexation and sphere-of-influence areas are not consistent with the rural, agricultural and open space land uses of the existing General Plan designations. The DEIR needs to be revised to reflect this.

Also, the proposed urban development designations in the annexation and sphere-of-influence areas will be in direct contrast with the adjacent scenic rural open spaces and will impact visual resources and view corridors.

Response: The land uses proposed in the General Plan are described in Section III-A of the EIR. The impacts expected due to buildout of these land uses are also described in section III-A. Regarding impacts to surrounding areas, see response to comment AA.78., above.

AA.80. Comment: Page III-166

According to Table I-2, the number of dwelling units resulting from buildout is 78,952 units, not the 66,811 units reported here. The school enrollment analysis should be revised. The breakdown between single family and multi-family is different than the one used in the air quality analysis (Table III-24). What is the proposed capacity of the Mountain Vista Elementary School and how will it ease the elementary student overcrowding which will result from the buildout of the proposed General Plan? The average persons per household size is increasing. How will this affect the methodology and approach (student generation rates) taken to assess school enrollment impacts resulting from the buildout? What thresholds of significance are used to determine whether buildout would have significant impacts on school facilities? What are the specific student enrollment impacts on the Desert Sands Unified School District? On the Coachella Valley Unified School District?

Response: The commentor is incorrect. The EIR states:

“Buildout of the proposed General Plan is expected to result in the construction of approximately 66,811 dwelling units...” (emphasis added).

The existing dwelling units in the City and planning area already have their children enrolled in schools in the area. Those numbers are reflected in Tables III-32 and III-33. Table III-34 represents the total school enrollment potential, including existing units. As regards Table III-24, there is no discrepancy. The numbers used in Table III-24 are identical to those used in Table III-34.

Mountain View Elementary School has opened since the release and distribution of the EIR. Its capacity is 700 students. It has a current enrollment of 508 students. The school therefore provides an additional 700 students with school space.

Average household size is actually decreasing in most statistical models, as the population in the area gets older. As stated by the commentor in comment AA.11, SCAG projects a decrease in household size by 2020.

All calculations in this section of the EIR use thresholds adopted by the school districts themselves, as cited in the document.

Enrollment impacts to the two districts will vary based on development patterns in the planning area. Since a large portion of the planning area occurs east of Jefferson (the boundary between the two districts), the majority of enrollment is expected to occur within the Coachella Valley Unified School District. Impacts to schools have been mitigated by the payment of fees by developers for all types of development. This state-wide program is expected to stay in effect, and to continue to provide mitigation for the impacts associated with General Plan buildout.

AA.81. Comment: Page III-170

The DEIR uses a low household size figure and therefore underestimates impact on library facilities. The DEIR uses 2.75 persons per household to determine the impacts. This number is considerably lower than the household size figures used by the California Department of Finance (3.263 persons per household) and the Southern California Association of Governments (3.24 persons per household in 2005 and 3.14 persons per household in 2020). The DEIR should be revised to reflect a current household size figure in analyzing public services. Also, what methodology and approach were used to evaluate impact on library services and facilities? What are the thresholds of significance used to

determine whether the project would have significant impacts on libraries?

Response: As regards household size, please see response to comment AA.11., above. The estimates are representative of the anticipated need. The methodology and assumptions made to calculate impacts to libraries are described on page III-170.

AA.82. Comment: Page III-172

The DEIR should be revised to reflect a current household size figure to analyze impact on police protection services. Also, what methodology and approach are used to assess impacts on police protection services resulting from the buildout of the proposed General Plan? What are the thresholds of significance used to determine whether there would be significant impact on police protection services?

Response: As regards household size, please see response to comment AA.11., above. The estimates are representative of the anticipated need. The methodology and assumptions made to calculate impacts to police services are described on page III-172.

AA.83. Comment: Page III-174

What methodology and approach were used to assess impact on fire protection services? What are the thresholds of significance used to determine whether there were significant impacts? Which fire agency currently serves the amendment and sphere-of-influence areas? Are fire stations planned for the proposed General Plan area? If so, where?

Response: The assumptions made to determine impacts to fire services are described on page III-174. As stated on page III-173 “fire protection is provided to the City of La Quinta and its planning area by the Riverside County Fire Department.” The General Plan also establishes a guideline of one firefighter per 1000 population. This standard is used as the criteria by which impacts are judged.

A fire station has been planned since the publication of the EIR. It will be located at Mile Avenue and Adams Street, within existing City limits. The City is currently acquiring the land, and public hearings on the project are scheduled for March before the City Council.

AA.84. Comment: Page III-175

What methodology and approach were used to assess impacts on health care facilities and services? What thresholds of significance were used to determine whether there would be significant impacts? Are any public health facilities planned to meet the increased population?

Response: The assumptions made to determine impacts to health care services are described on page III-176. Health care, as stated in the document, is operated by private companies, who will address the need for additional services as market forces make that necessary.

AA.85. Comment: Page III-177

Where are existing solid waste facilities in relation to the proposed annexation and sphere-of-influence amendment areas, and what are the landfill capacities and closure dates? How much solid waste is currently generated? How much solid waste will be generated in the future? What methodology and approach were used to assess solid waste impacts? What thresholds of significance were used to determine whether there would be significant impacts? It is unrealistic to assume that the buildout pursuant to the proposed General Plan (19,137,651 square feet of commercial and 28,835,849 square feet of industrial) will not result in any hazardous waste generation.

Response: The locations, capacities, daily tonnage and closure dates of existing landfills is described on page III-177. The methodology used in the EIR is cited in footnote #71.

The commentor has misread the document. The EIR does not state that buildout will not result in any hazardous waste generation. As stated in the General Plan, the City currently is home to small-scale generators of hazardous waste, such as gasoline service stations, dry cleaners and medical facilities. The General Plan also states that this pattern is expected to continue. The General Plan specifically calls for the development of Light Industrial land uses, and does not allow heavy industry, which would be a more likely source for hazardous waste generation.

AA.86. Comment: Page III-181

What is the service area for the existing sewage treatment plant? How much wastewater will be generated within the project area? What methodology and approach were used to assess wastewater impacts?

What thresholds of significance were used to determine whether significant impacts would result?

Response: The service areas and assumptions for the sewage treatment plants are described on page III-181 and III-182. The usage rates developed by CVWD, and the data provided by that agency were used to determine the level of impacts associated with buildout of the General Plan.

AA.87. Comment: Page III-183

The DEIR uses a low household size to estimate water usage and therefore underestimates the impacts on domestic water service. (See prior discussion). The DEIR should be revised to reflect an updated average household size to analyze impacts on domestic water services. What methodology and approach were used to assess domestic water service impacts? What thresholds of significance were used to determine whether significant impacts result? What impacts occur due to development in the proposed annexation and sphere-of-influence amendment areas?

Response: See responses to comments AA.11. and AA.25., above. The usage rates developed by CVWD, and the data provided by that agency were used to determine the level of impacts associated with buildout of the General Plan.

AA.88. Comment: Page III-186

What methodology and approach were utilized to assess electrical service impacts? What thresholds of significance were used to determine whether significant impacts will result?

Response: The assumptions are described on page III-186. The usage rates developed by Southern California Edison are included in this section, and are used to determine the potential impacts associated with buildout of the General Plan.

AA.89. Comment: What methodology and approach are taken to assess natural gas service impacts resulting from the buildout of the proposed General Plan? What are the thresholds of significance used to determine whether there were significant impacts resulting from the buildout of the Proposed General Plan on natural gas services? What are the impacts from the proposed annexation and sphere-of-influence amendment? What impact will this have on the adjacent jurisdictions?

Response: The methodology is described on page III-189. Impacts from the Annexation area and SOI are described on page III-189. The usage rates developed by The Gas Company are included in this section, and are used to determine the potential impacts associated with buildout of the General Plan.

AA.90. Comment: Page III-190

What methodology and approach were used to assess cable service impacts? What thresholds of significance were used to determine whether significant impacts will result?

Response: The methodology is described on page III-190. The ability of the cable company to expand services as development occurs was used as the determining factor in assessing impacts associated with buildout of the General Plan.

AA.91. Comment: Page III-198

The DEIR uses a low household size assumption to assess public service impacts (see previous discussion) and therefore underestimates impact. The DEIR should be revised to reflect an updated household size assumption to analyze impacts on public services.

Response: See response to comment AA.11., above.

AA.92. Comment: Page IV-1

Is the loss of 26,312 acres of Prime Farmland considered an unavoidable significant impact?

Response: Section III of the EIR states that the buildout of the General Plan will result in unmitigated impacts on Agricultural Resources. The discussion was omitted in error in Section IV. The following text is hereby added to page IV-1:

Agricultural Resources

As described above, the existing General Plan designates a total of 19,938 acres for Agricultural development. It is difficult to anticipate whether and to what extent these lands would actually be converted to residential uses in the future, as the decision to do so will be left to individual landowners. Due to the application of the Agricultural Overlay, implementation of the Recommended General Plan will not directly result in the conversion of prime farmland or farmland of statewide importance to residential uses, but it will provide an

opportunity for this conversion to take place without requiring a General Plan or zoning amendment or other administrative approval. Similarly, for lands covered by the Agricultural Overlay, the Recommended General Plan will not directly cause the cancellation of any contract made pursuant to the Williamson Act, but it could provide the ability for landowners to cancel their contracts if they choose to develop.

Implementation of the Recommended Land Use Plan and Annexation No. 12 could result in the conversion of prime farmland and farmland of statewide importance to urban land uses, and could result in the decisions by property owners to not renew Williamson Act contracts on lands in the easterly portion of the planning area. Even with implementation of mitigation measures, the impacts associated with long term loss of prime agricultural lands will be significant.

AA.93. Comment: Page V-1

The “More Intense” Alternative should not be considered in the DEIR since alternative does not comply with CEQA regulations by reducing or eliminating environmental impacts. With the “More Intense” Alternative eliminated from consideration, the DEIR does not present an adequate range of reasonable alternative to meet CEQA requirements.

Response: See response to comment AA.12., above.

AA.94. Comment: Page V-13

What impacts to existing agricultural resources result from a “No Project” Alternative? What are the impacts of the “No Project” Alternative on land uses within the adjacent jurisdictions?

Response: Impacts to agricultural resources under the No Project alternative are described on page V-3. Under the County jurisdiction currently in effect, the land owners who have agricultural land uses on their properties have the ability to change that land use at any time through a General Plan Amendment and Change of Zone. As previously stated, the land uses in adjacent jurisdictions are similar to those proposed in the General Plan. Impacts to surrounding jurisdictions’ land uses will not vary significantly for any of the alternatives.

AA.95. Comment: Page V-14

Under CEQA regulations, Alternative I: More Intense Development should not be considered as an alternative in the DEIR because it does not reduce or eliminate any significant environmental impacts. Under

alternative II: Less Intensive Development Scenario, what are the impacts to existing agricultural resources? How many acres of Prime Farmland would be converted to urban land uses? How does the Less Intense Alternative impact land use in adjacent jurisdictions? How would the land use impacts associated with the project differ from No Project and Less Intense Development Alternatives? How would land use impacts on adjacent jurisdictions differ between the No Project and Less Intense Development alternatives?

Response: See response to comment AA.12. and AA.94., above.

Table V-3 illustrates that 5594 acres would be converted to Very Low Density residential, up to 2 units per acre. That acreage is currently farmland. Comparisons of each alternative is provided categorically for each issue area on pages V-13 through V-36.

AA.96. Comment: Page V-16

What traffic impacts in adjacent jurisdictions (circulation and intersections) result from the No Project Alternative?

Response: Impacts from the No Project Alternative are illustrated in Table V-4 on page V-17.

AA.97. Comment: Page V-17

Under Alternative II: Less Intensive Development Scenario (Table V-4), the traffic impacts are greater than the proposed project. How does the Less Intense Alternative impact circulation and intersections in adjacent jurisdictions? How would traffic impacts differ from No Project and Less Intense Development Alternatives? How would traffic and circulation impacts on adjacent jurisdictions differ among the alternatives?

Response: The differences between alternatives is summarized on page V-17. The complete analysis is included in Appendix F.

AA.98. Comment: Page V-18

The DEIR does not provide adequate information to compare the relative impacts with respect to soils and geology. How would project differ from the No Project and Less Intense Development Alternatives?

Response: The comparison is provided on page V-18. The analysis clearly shows that all alternatives result in similar impacts, and that all alternatives will require individual project analyses in the future.

AA.99. Comment: Page V-19

The DEIR does not provide adequate information to compare the relative impacts on hydrological systems among the alternatives. How do the No Project and Less Intense Development Alternatives affect flooding in adjacent jurisdictions?

Response: The comparison is provided on page V-19. The analysis clearly shows that all alternatives result in similar impacts, and that all alternatives will require individual project analyses in the future.

AA.100. Comment: Page V-20

The DEIR does not provide the quantitative information necessary to analyze potential water quality and resources impacts for the alternatives. What assumptions were used for the population projections? Will groundwater overdraft or water quality impacts result from the No Project and Less Intense Development Alternatives both within the project area and regionally?

Response: The comparison is provided on page V-20. The assumptions are listed on that page also. Groundwater overdraft will have a lesser impact under both the No Project and Less Intense alternatives, insofar as both these alternatives result in lower water usage. However, since overdraft currently occurs and will continue to occur with additional development, overdraft conditions will occur in all alternatives. Water quality impacts under all alternatives are discussed on page V-21.

AA.101. Comment: Page V-22

The DEIR does not provide sufficient information to enable comparison of the potential biological resource impacts among the alternatives. Would (sic) the No Project and Less Intense Development Alternatives impact biological resources in adjacent jurisdictions? How do impacts associated with the project compare to the No Project and Less Intense Development alternatives both locally and regionally?

Response: The comparison is provided on page V-22.

AA.102. Comment: Page V-22

The DEIR provides no information to enable comparison of potential cultural resources impacts among the alternatives. Will the No Project and Less Intense Development Alternatives impact cultural resources in adjacent jurisdictions? How do air quality (sic) impacts compare to impact (sic) from No Project and Less Intense Development alternatives both locally and regionally?

Response: The comparison is provided on page V-23.

AA.103. Comment: Page V-23

How might the No Project and Less Intense Development Alternatives affect air quality in the adjacent jurisdictions? How do project air quality compare to impacts from the No Project and Less Intense Development Alternatives both locally and regionally?

Response: The comparison is provided on pages V-23 through V-25.

AA.104. Comment: Page V-25

How might traffic noise associated with the No Project and Less Intense Development Alternatives impact adjacent jurisdictions? How do noise impacts compare between the alternatives?

Response: The comparison is summarized on page V-26. The full analysis is included in Appendix E.

AA.105. Comment: Page V-27

What are the regional visual resource impacts associated with the No Project and Less Intense Development Alternatives? How do visual impacts compare between the alternatives?

Response: The comparison is provided on pages V-28 and V-29.

AA.106. Comment: Page V-29

The DEIR underestimates the public services and utilities impacts because the analysis utilizes a low average household size of 2.75 persons per household. As discussed above, the California Department of Finance and SCAG project a larger average household size, at least 3.2 and above. The public services impacts of the alternatives should be re-analyzed using this updated household size. How would the public

service impacts differ from the No Project and Less Intense Development Alternatives both locally and regionally?

Response: See comment AA.12., above. The comparisons are provided categorically throughout this section, on pages V-28 through V-36.

AA.107. Comment: Page VII-1

Prime Farmland is considered a non-renewable environmental resource. The DEIR should state that Prime Farmland will be permanently lost due to implementation of the proposed General Plan.

Response: Comment noted. Agricultural resources is hereby added to paragraph 2 on page VII-1, as follows:

“The loss of prime farmland to development will represent a permanent significant loss of a non-renewable resource.”

AA.108. Comment: Page VIII-1

How do the growth-inducing impacts of the proposed General Plan impact adjacent jurisdictions’ agricultural resources?

Response: That description is provided on page VIII-1 and VIII-2.

AA.109. Comment: Page VIII-2

The DEIR underestimates the cumulative impacts by using a figure of 2.75 persons per household (see discussion above). The DEIR lacks consistent application of the cumulative impact analysis, especially as it pertains to the proposed annexation and sphere-of-influence amendment. Buildout of the proposed General Plan, together with development within the proposed annexation and sphere-of-influence areas, would have a significant cumulative impact on the adjacent jurisdictions.

Response: Comment noted. See response to comment AA.12., above.

AA.110. Comment: In conclusion, the environmental analysis contained in the DEIR exhibits significant flaws. The analysis substantially underestimates the type and severity of significant impacts associated with the buildout of the proposed General Plan and within the annexation, and sphere-of-influence amendment areas. Because of inconsistencies in the document and the underestimation of impacts, the DEIR requires substantial reworking to comply with CEQA and also requires recirculation. In particular, a thorough analysis of impacts on the cities of Indio and

Coachella associated with the proposed annexation and the sphere-of-influence amendment are critical.

Response: The City of La Quinta's responses to City of Indio's comments is set forth above in response to comments AA.1–AA.109.

SECTION II

**COMMENT LETTERS
ON THE
DRAFT ENVIRONMENTAL IMPACT REPORT**

The following comment letters were received on the Draft EIR transmitted to various public agencies and interested parties. Comments restated in Section I are bracketed in this section and correspond to the comment numbers in Section I.



ESTABLISHED IN 1918 AS A PUBLIC AGENCY

COACHELLA VALLEY WATER DISTRICT

POST OFFICE BOX 1058 • COACHELLA, CALIFORNIA 92236 • TELEPHONE (760) 398-2651

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August 16, 2001

File: 1150.14

Fred Baker
Principle Planner
City of La Quinta
78-495 Calle Tampico
La Quinta, California 92253

Dear Mr. Baker:

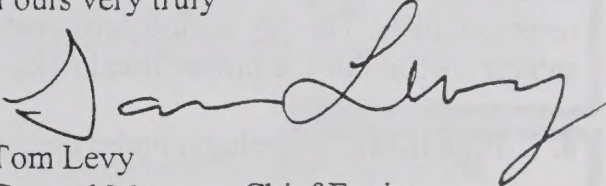
Subject: Draft Environmental Impact Report for the
La Quinta General Plan, Annexation No. 12
and Sphere of Influence Amendment

This is in response to your transmittal and request for comments for the above-referenced document dated July 13. We appreciate the opportunity to respond to this document. The proposed annexation and sphere of influence amendments are within our service area. Future development within the subject area will most likely affect all five types of facilities: domestic water, sanitation, stormwater, irrigation supply and agricultural drainage.

We encourage the city's continuing cooperation in the Coachella Valley Water Management Plan as a means of securing adequate water supplies for the future. Our comments can be found in attachment A, enclosed.

If you have any questions, please contact Joe Cook, planning engineer, extension 292.

Yours very truly


Tom Levy
General Manager-Chief Engineer

Enclosure/1/as

JEC:md\eng\sw\agu\baker

Attachment A

1. Page I-27, Water Resources, second paragraph, fourth sentence, please revise to reflect the following:

The district estimates that 40 percent of the domestic water used in the upper valley is reintroduced into the groundwater table through percolation.

A-2

In the lower valley (areas south and east of Point Happy) this number ranges between 50 percent and 25 percent depending on the subterranean soil characteristics in the vicinity of a project.

2. Page II-7, Water Quality/Resources, under the subheading of Whitewater River Subbasin, third paragraph:

This sentence is incorrect. The increased water levels after 1951 was the result of decreased use of groundwater after Colorado River water became available for farm irrigation. After Colorado River water became the primary source of agriculture water and groundwater levels began to rise until the 1970's when well water was used for drip irrigation.

A-3

3. Page III-75, Soils and Geology, under the subheading Mitigation Measures, Item A:

This section is incorrect in suggesting that Lake Cahuilla may fall under the jurisdiction of the California Division of Safety of Dams. As a federally owned facility, Lake Cahuilla is not under the jurisdiction of the State Division of Dams. Lake Cahuilla is operated and maintained by CVWD and it is the district's responsibility to maintain the structural safety of the lake.

A-4

3. Page III-81, Flood Hazard Areas should address the following:

Much of the area within the proposed annexation and the proposed sphere of influence is currently identified as a zone D on the Federal Flood Insurance Rate Maps that are in effect at this time. A zone D represents areas that have undetermined flood risks. As the city annexes these areas, it becomes the local NFIP community with jurisdictional responsibilities. The city should participate with CVWD in funding flood risk studies for the subject area so that the proper flood risks may be mapped.

A-5

4. Page III-86, Hydrology, under the subheading Mitigation Measures, item C:

This paragraph refers to the seismic safety of CVWD's above ground reservoirs. The water tanks currently meet seismic requirements and are not in need of seismic retrofitting. District reservoirs are fitted with seismic couplings to absorb seismic forces. The reservoirs are also fitted with automatically actuated seismic valves that will shut off within 45 seconds of seismic activity.

A-6

5. Page III-87, Water Resources/Quality:

This section should refer to the Coachella Valley Draft Water Management Plan, prepared by CVWD, which discusses existing conditions and mitigation goals for the general plan planning area. The mitigation measures beginning on page III-94, should indicate the city's support for implementing the goals of the water management plan including source substitution, conservation and groundwater recharge.

A-7

6. Page III-89, Domestic Water Services third sentence:

This sentence identifies the Myoma Dunes Mutual Water Company as the domestic water purveyor for all of Bermuda Dunes area. This is not correct in that the district has several domestic water customers in Bermuda Dunes. Some of CVWD's customers are located east of Adams Street also on the north and south side of Darby Road and areas along and adjacent to the east side of Washington Street. The jurisdictional boundaries between different water agencies will be confirmed during the city's planning review process for new developments.

A-8

7. Page III-183, Domestic Water Service under the subheading Coachella Valley Water District we recommend the following revisions:

First paragraph, second sentence we recommend the word limited be deleted. The district serves many square miles of land south of Avenue 58.

First paragraph, third sentence we recommend that the part "A new well is proposed..." be changed to "A new well has been constructed".

First paragraph, fourth sentence we recommend that the part "The existing wells have been drilled to depth ranging from 700 to 800 feet..." be changed to "The existing wells have been drilled to a depth ranging from 700 to 1000 feet..."

A-9

First paragraph, sixth sentence we recommend to be deleted completely.

Second paragraph, third sentence should be revised to affirm that Reservoir No. 6725 has been constructed with a capacity of 10 million gallons.

Second paragraph, fourth sentence should be revised to state the district's plans to construct an additional 5- to- 10-million gallon reservoir near the southeastern edge of the La Quinta cove.

8. Page V-20, Water Resources first paragraph, second sentence refers to the current overdraft condition of about 0.24 percent per year. We recommend the report stay consistent with section III-88 and use 0.32 percent for the year 1999.

A-10



Coachella Valley Mosquito and Vector Control District

43-420 Trader Place • Indio, CA 92201 • (760) 342-8287 • Fax (760) 342-8110

E-mail: CVmosquito@earthlink.net • Website: www.CVmosquito.org

September 7, 2001

B

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Fred Baker
Principal Planner
City of La Quinta
78-495 Calle Tampico
La Quinta, CA 92253

Subject: Draft Environmental Impact Report (SCH Number 2000091023) for the
La Quinta General Plan, Annexation No. 12 and Sphere Influence
Amendment

Dear Mr. Baker:

Thank you for the opportunity to express our opinion regarding the environmental
impact report for the Draft Environmental Impact Report (SCH Number
2000091023).

In regard to the proposed project, one of the District's concerns is in the
possibility of creating breeding sources for mosquitoes and aquatic midges by
constructing flooding retention basins and drainage systems. The newly
established drainage systems, although generally limited in size and location by
the plan, could support breeding sources for vector species of mosquitoes, if not
properly designed and constructed. It is a fact that one of the indigenous
mosquito species, *Culex quinquefasciatus*, is a major vector for St. Louis
encephalitis and western equine encephalomyelitis in the Coachella Valley.

B-1

The District would like to take this opportunity to bring to your attention the
necessity of incorporating our District in the process of evaluating proposed
architectural plans of drainage facilities and retention basins in order to insure that
the public is protected from vectors and nuisance species that can be created by
the proposed project.

B-2

If you have further questions, please feel free to contact me.

Sincerely,

A handwritten signature in dark ink, appearing to read "Donald E. Goms", is written over a horizontal line.

Donald E. Goms
General Manager

August 9, 2001

Desert Hot Springs
Palm Springs
Cathedral City

MEMBERS
Rancho Mirage
Palm Desert
Indian Wells
La Quinta
A Public Agency

Indio
Coachella
Riverside County



C

Mr. Fred Baker
Principal Planner
City of La Quinta
78-495 Calle Tampico
La Quinta, CA. 92253

RE: Comments on the Draft EIR for the La Quinta General Plan

Dear Mr. Baker:

SunLine Transit Agency has reviewed the above referenced document and would like to at this time inform you of some changes to our fixed route service that occurred July 1, 2001 which affects text within this document.

Referencing section III page 36 under Public Transportation, changes to our service in July 2001 included the combination of routes 86 and 91 into one route which will be called the Line 91. The combination of these two routes will allow for better frequency for residents of the east end of the valley.

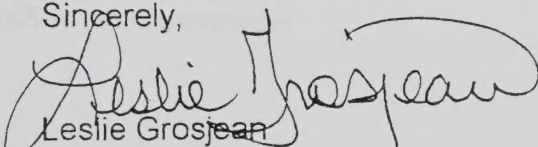
The Line 91 will operate eight round trips seven days a week.

Also, there were some additions to the Line 111. The Line 111 now operates 38 round trips on consistent 25 minute headways Monday through Friday and 23 round trips on weekends at 44 minute headways.

The Line 70 which operates within La Quinta is scheduled for service additions next July 2002. Our Planning and Operations Departments are currently working on this project.

If you should have any questions regarding these changes. Please feel free to give me a call at (760) 343-3456 ext. 119.

Sincerely,


Leslie Grosjean
Sr. Transportation Analyst

Cc: Nicole Sauviat Criste

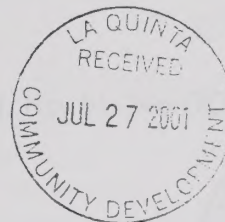
C-1



Sheriff

82-695 DR. CARREON BLVD. • INDIO, CA 92201 • (760) 863-8990

July 25, 2001



D

Mr. Fred Baker
Principal Planner
City of La Quinta
78495 Calle Tampico
La Quinta, Ca 92253

Re: La Quinta General Plan, Annexation No. 12 & Sphere of Influence Amendment

Dear Mr. Baker:

The Sheriff's Department has the following comments to make regarding this plan.

- ♦ Page II-15 (Police Protection) - The city currently contracts for 82 hours of patrol time per day. They also contract for a three-man special enforcement unit, a school resource officer, two community service officers, a motor officer, and a dedicated city sergeant.

D-1

Staffing levels and the law enforcement contract are reviewed annually.

- ♦ Page III-172 (Police Protection/Existing Conditions) - same as above

D-2

The Sheriff's Department appreciates the opportunity to comment on this plan from a law enforcement point of view.

Thank you.

Sincerely,
Larry D. Smith, Sheriff

Darla Singerton
Darla Singerton, Captain
Indio Station Commander



The
Gas
Company®

Southern California
Gas Company
1981 W. Lugonia Avenue
Redlands, CA 92374-9720

Mailing Address:
PO Box 3003, SC8031
Redlands, CA 92373-0306

A  Sempra Energy™ company

E

July 23, 2001

Gas Co. Ref. No. 01-346 OG

City of La Quinta
78-495 Calle Tampico
La Quinta, CA 92253

Attention: Fred Baker

Re: Draft EIR – City of La Quinta Comprehensive General Plan, SCH No.
2000091023.



Thank you for the opportunity to respond to the above-referenced project. Please note that Southern California Gas Company has facilities in the area where the above named project is proposed. Gas service to the project could be provided without any significant impact on the environment. The service would be in accordance with the Company's policies and extension rules on file with the California Public Utilities Commission at the time contractual arrangements are made.

E - 1

You should be aware that this letter is not to be interpreted as a contractual commitment to serve the proposed project, but only as an informational service. The availability of natural gas service, as set forth in this letter, is based upon present conditions of gas supply and regulatory policies. As a public utility, The Southern California Gas Company is under the jurisdiction of the California Public Utilities Commission. We can also be affected by actions of federal regulatory agencies. Should these agencies take any action, which affects gas supply, or the conditions under which service is available, gas service will be provided in accordance with revised conditions.

E - 2

Typical demand use for:

a.	Residential	(System Area Average/Use Per Meter) <u>Yearly</u>
	Single Family	799 therms/year dwelling unit
	Multi-Family 4 or less units	482 therms/year dwelling unit
	Multi-Family 5 or more units	483 therms/year dwelling unit

E - 3

These averages are based on total gas consumption in residential units served by Southern California Gas Company, and it should not be implied that any particular home, apartment or tract of homes will use these amounts of energy.

b. Commercial

Due to the fact that construction varies so widely (a glass building vs. a heavily insulated building) and there is such a wide variation in types of materials and equipment used, a typical demand figure is not available for this type of construction. Calculations would need to be made after the building has been designed.

E - 3

We have Demand Side Management programs available to commercial/industrial customers to provide assistance in selecting the most effective applications of energy conservation techniques for a particular project. If you desire further information on any of our energy conservation programs, please contact our Commercial/Industrial Support Center at 1-800-GAS-2000.

E - 4

Sincerely,

John DeWitt
Technical Supervisor

SOUTHERN CALIFORNIA



**ASSOCIATION of
GOVERNMENTS**

Main Office

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Los Angeles, California

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August 16, 2001

Mr. Fred Baker
Principal Planner
City of La Quinta
78-495 Calle Tampico
La Quinta, CA 92253



F

RE: **Comments on the Draft Environmental Impact Report for the City of La
Quinta Comprehensive General Plan Update - SCAG No. I 20010402**

Dear Mr. Baker:

Thank you for submitting the **Draft Environmental Impact Report for the City of La Quinta Comprehensive General Plan Update** to SCAG for review and comment. As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects, and programs with regional plans.

This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies. If you have any questions regarding the attached comments, please contact me at (213) 236-1867. Thank you.

Sincerely,

JEFFREY M. SMITH, AICP
Senior Planner
Intergovernmental Review

Officers: President: Supervisor Jon Mikels, County of San Bernardino • First Vice President: Councilmember Hal Bernson, Los Angeles • Second Vice President: Councilmember Bev Perry, Brea • Immediate Past President: Mayor Pro Tem Ron Bates, Los Alamitos

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Orange County: Charles Smith, Orange County • Ron Bates, Los Alamitos • Ralph Bauer, Huntington Beach • Art Brown, Buena Park • Lou Bone, Tustin • Elizabeth Cowan, Costa Mesa • Cathryn DeYoung, Laguna Niguel • Richard Dixon, Lake Forest • Alta Duke, La Palma • Shirley McCracken, Anaheim • Bev Perry, Brea • Tod Ridgeway, Newport Beach

Riverside County: Bob Buster, Riverside County • Ron Loveridge, Riverside • Greg Petus, Cathedral City • Ron Roberts, Temecula • Jan Rudman, Corona • Charles White, Moreno Valley

San Bernardino County: Jon Mikels, San Bernardino County • Bill Alexander, Rancho Cucamonga • David Eshleman, Fontana • Lee Ann Garcia, Grand Terrace • Bob Hunter, Victorville • Gwenn Norton-Perry, Chino Hills • Judith Valles, San Bernardino

Ventura County: Judy Mikels, Ventura County • Glen Becerra, Simi Valley • Donna De Paola, San Buenaventura • Toni Young, Port Hueneme

Riverside County Transportation Commission: Robin Lowe, Hemet

Ventura County Transportation Commission: Bill Davis, Simi Valley



**COMMENTS ON THE
DRAFT ENVIRONMENTAL IMPACT REPORT
FOR THE
CITY OF LA QUINTA
COMPREHENSIVE GENERAL PLAN UPDATE
SCAG NO. I 20010402**

PROJECT DESCRIPTION

The proposed Project consists of a Comprehensive General Plan Update for the City of La Quinta, in Riverside County. The proposed Project involves the planning of 53,498 acres of incorporated lands and sphere of influence areas.

INTRODUCTION TO SCAG REVIEW PROCESS

The document that provides the primary reference for SCAG's project review activity is the Regional Comprehensive Plan and Guide (RCPG). The RCPG chapters fall into three categories: core, ancillary, and bridge. The Growth Management (adopted June 1994), Regional Transportation Plan (adopted April 2001), Air Quality (adopted October 1995), Hazardous Waste Management (adopted November 1994), and Water Quality (adopted January 1995) chapters constitute the core chapters. These core chapters respond directly to federal and state planning requirements. The core chapters constitute the base on which local governments ensure consistency of their plans with applicable regional plans under CEQA. The Air Quality and Growth Management chapters contain both core and ancillary policies, which are differentiated in the comment portion of this letter. The Regional Transportation Plan (RTP) constitutes the region's Transportation Plan. The RTP policies are incorporated into the RCPG.

Ancillary chapters are those on the Economy, Housing, Human Resources and Services, Finance, Open Space and Conservation, Water Resources, Energy, and Integrated Solid Waste Management. These chapters address important issues facing the region and may reflect other regional plans. Ancillary chapters, however, do not contain actions or policies required of local government. Hence, they are entirely advisory and establish no new mandates or policies for the region.

Bridge chapters include the Strategy and Implementation chapters, functioning as links between the Core and Ancillary chapters of the RCPG.

Each of the applicable policies related to the proposed project are identified by number and reproduced below in italics followed by SCAG staff comments regarding the consistency of the Project with those policies.

SUMMARY OF SCAG STAFF COMMENTS

1. The Draft EIR does not address the relationship of the proposed project to **applicable regional plans** as required by Section 15125 [d] of *Guidelines for Implementation of the California Environmental Quality Act*.
2. The Final EIR should address the relationships (consistency with core policies and support of ancillary policies) to SCAG's Regional Comprehensive Plan and Guide, utilizing commentary from the following detailed SCAG staff comments. The response should also discuss any inconsistencies between the proposed project and applicable regional plans. We suggest that you identify the specific policies, by policy number, with a discussion of consistency or support with each policy.

F-1

CONSISTENCY WITH REGIONAL COMPREHENSIVE PLAN AND GUIDE POLICIES

The Growth Management Chapter (GMC) of the Regional Comprehensive Plan and Guide contains a number of policies that are particularly applicable to the City of La Quinta Comprehensive General Plan Update.

Core Growth Management Policies

- 3.01 *The population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies, shall be used by SCAG in all phases of implementation and review.*

F-2

SCAG staff comments. The Draft EIR references the adopted RTP 1998 SCAG's Population, Household and Employment forecasts for the City of La Quinta. The Draft EIR should use growth forecasts from the adopted 2001 RTP, which were included in SCAG's May 23, 2001 letter on the Corrected NOP for the proposed Project. The estimates in the Draft EIR are slightly above the adopted RTP growth forecasts. The Project is partially consistent with this core RCPG policy.

- 3.03 *The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.*

SCAG staff comments. The Draft EIR does not present a discussion on Project phasing and timing. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive or detracts from the achievement of this policy. Based on the information provided in the Draft EIR, we

F-3

are unable to determine if the Project is consistent with this core RCPG policy.

Regional Transportation Plan

The Regional Transportation Plan (RTP) also has goals, objectives, policies and actions pertinent to this proposed project. This RTP links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. Among the relevant goals, objectives, policies and actions of the RTP are the following:

Core Regional Transportation Plan Policies

4.01 *Transportation investments shall be based on SCAG's adopted Regional performance Indicators.*

SCAG staff comments. The Draft EIR does not provide a discussion on Transportation investments based on the following SCAG adopted Regional Performance Indicators:

Mobility - *Transportation Systems should meet the public need for improved access, and for safe, comfortable, convenient, faster and economical movements of people and goods.*

- Average Work Trip Travel Time in Minutes – 25 minutes (Auto)
- PM Peak Freeway Travel Speed – 45 minutes (Transit)
- PM Peak Non-Freeway Travel Speed
- Percent of PM Peak Travel in Delay (Fwy)
- Percent of PM Peak Travel in Delay (Non-Fwy)

Accessibility - *Transportation system should ensure the ease with which opportunities are reached. Transportation and land use measures should be employed to ensure minimal time and cost.*

- Work Opportunities within 45 Minutes door to door travel time (Mode Neutral)
- Average transit access time

Environment - *Transportation system should sustain development and preservation of the existing system and the environment. (All Trips)*

- CO, ROG, NOx, PM10, PM2.5 – Meet the applicable SIP Emission Budget and the Transportation Conformity requirements

Reliability – Transportation system should have reasonable and dependable levels of service by mode. (All Trips)

- Transit – 63%
- Highway – 76%

Safety - Transportation systems should provide minimal accident, death and injury. (All Trips)

- Fatalities Per Million Passenger Miles – 0
- Injury Accidents – 0

Equity/Environmental Justice - The benefits of transportation investments should be equitably distributed among all ethnic, age and income groups. (All trips)

- By Income Groups Share of Net Benefits – Equitable Distribution of Benefits among all Income Quintiles

Cost-Effectiveness - Maximize return on transportation investment (All Trips). Air Quality, Mobility, Accessibility and Safety

- Return on Total Investment – Optimize return on Transportation Investments

The Final EIR should address the manner in which the Project is supportive of or detracts from the achievement of the eight core RTP objectives. Based on the information provided, we are unable to determine whether the Project is consistent with this core RCPG policy.

- 4.02 *Transportation investments shall mitigate environmental impacts to an acceptable level.*

SCAG staff comments. The Draft EIR in Section 3-C (Traffic/Circulation) identifies transportation and circulation impacts, and details the measures to mitigate these impacts on page III-58. The Project is consistent with this core RCPG policy.

- 4.04 *Transportation Control Measures shall be a priority.*

SCAG staff comments. The Draft EIR, on page III-58, includes a discussion on the City's development and Implementation of Transportation Demand Management strategies, to extend or preserve capacity roadways. In addition, mitigation measures support the implementation of Transportation Control Measures. The Project is consistent with this core RCPG policy.

F-4

F-5

F-6

- 4.16 *Maintaining and operating the existing transportation system will be a priority over expanding capacity*

SCAG staff comments. The Draft EIR, in Section 3-C (Traffic/Circulation) includes a discussion on the existing circulation system, and recommends measures to upgrade the existing circulation system. This should maintain and operate the existing transportation system. The Project is consistent with this core RTP policy.

F-7

GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE REGIONAL STANDARD OF LIVING

The Growth Management goals to develop urban forms that enable individuals to spend less income on housing cost, that minimize public and private development costs, and that enable firms to be competitive, strengthen the regional strategic goal to stimulate the regional economy. The evaluation of the proposed project in relation to the following policies would be intended to guide efforts toward achievement of such goals and does not infer regional interference with local land use powers

- 3.05 *Encourage patterns of urban development and land use, which reduce costs on infrastructure construction and make better use of existing facilities.*

SCAG staff comments. The Draft EIR in Sections 3-C (Traffic/Circulation) and 3-L (Public Services and Facilities) acknowledges that the Project will maximize the use of existing infrastructure and improve infrastructure deficiencies to meet the needs of the proposed Project. In addition, increases in demand for services will occur gradually as additional development takes place. Mitigation measures recommended in each section would address identified impacts. The Project is supportive of this ancillary RCPG policy.

F-8

- 3.09 *Support local jurisdictions' efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.*

SCAG staff comments. See SCAG comments on policy 3.05. The Project is supportive of this ancillary RCPG policy.

F-9

- 3.10 *Support local jurisdictions' actions to minimize red tape and expedite the permitting process to maintain economic vitality and competitiveness.*

SCAG staff comments. The Draft EIR only addresses subjects that may have

F-10

adverse environmental impacts. It is written in a concise manner, where all possible adverse impacts are mitigated this will help minimize red tape, and help maintain the economic vitality and competitiveness of the City of La Quinta. In addition, the Draft EIR, on page I-30, includes a number of General Plan goals and policies, which will also help to minimize red tape, and help maintain the economic vitality and competitiveness of the City of La Quinta. The Project is supportive of this ancillary RCPG policy.

F-10

GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE THE REGIONAL QUALITY OF LIFE

The Growth Management goals to attain mobility and clean air goals and to develop urban forms that enhance quality of life, that accommodate a diversity of life styles, that preserve open space and natural resources, and that are aesthetically pleasing and preserve the character of communities, enhance the regional strategic goal of maintaining the regional quality of life. The evaluation of the proposed project in relation to the following policies would be intended to provide direction for plan implementation, and does not allude to regional mandates.

- 3.12 *Encourage existing or proposed local jurisdictions' programs aimed at designing land uses which encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled, and create opportunities for residents to walk and bike.*

F-11

SCAG staff comments. The Draft EIR does not include a discussion on land uses that encourages the coordination and implementation of transit and transit facilities, and bikeways, pedestrian and/or equestrian trails. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive or detracts from the achievement of this policy. Based on the information provided in the Draft EIR, we are unable to determine if the Project is supportive of this ancillary RCPG policy.

- 3.13 *Encourage local jurisdictions' plans that maximize the use of existing urbanized areas accessible to transit through infill and redevelopment.*

SCAG staff comments. The Draft EIR does not address the subject of transit service to serve and provide access to new development and redeveloped areas. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive or detracts from the achievement of this policy. Based on the information provided in the Draft EIR, we are unable to determine if the Project is supportive of this ancillary RCPG policy.

F-12

- 3.17 *Support and encourage settlement patterns, which contain a range of urban densities.*

SCAG staff comments. The Draft EIR in Section 3-A (Land Use Compatibility) identifies ranges of urban densities. The Project is supportive of this ancillary RCPG policy.

F-13

- 3.18 *Encourage planned development in locations least likely to cause adverse environmental impact.*

SCAG staff comments. The Project is proposed in a manner, which will minimize adverse environmental impacts. Mitigation measures included in the Draft EIR have been developed to address identified impacts. The City of La Quinta should carefully consider the adequacy of these measures. The Project is supportive of this ancillary RCPG policy.

F-14

- 3.20 *Support the protection of vital resources such as wetlands, groundwater recharge areas, woodlands, production lands, and land containing unique and endangered plants and animals.*

SCAG staff comments. The Draft EIR in Section 3-G (Biological Resources) discusses the Projects' impact on biological resources. The Draft EIR recommends a number of mitigation measures to address impacts to plants, invertebrates and reptiles, birds and mammals. The Project is supportive of this ancillary RCPG policy.

F-15

- 3.21 *Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.*

SCAG staff comments. The Draft EIR in Section 3-H (Cultural Resources) identifies potential impacts related to archaeological and historic resources. A number of mitigation measures are recommended to address impacts to archaeological and historic resources. The Project is supportive of this ancillary RCPG policy.

F-16

- 3.22 *Discourage development, or encourage the use of special design requirements, in areas with steep slopes, high fire, flood, and seismic hazards.*

SCAG staff comments. The Draft EIS in Section 3-D (Soils and Geology) identifies potential impacts related to soils, seismicity, induced slope instability, induced inundation and liquefaction. Mitigation measures recommended include the

F-17

F-17

implementation of building codes, specific requirements and/or project design. The Project is supportive of this ancillary RCPG policy.

- 3.23 *Encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage, and to develop emergency response and recovery plans*

F-18

SCAG staff comments. The Draft EIR in Section J-N (Noise) acknowledges potential noise impacts related to aviation, traffic, stationary noise sources and construction activities. Mitigation measures recommended in this Section have been developed to address identified impacts. The Project is supportive of this ancillary RCPG policy.

GMC POLICIES RELATED TO THE RCPG GOAL TO PROVIDE SOCIAL, POLITICAL, AND CULTURAL EQUITY

The Growth Management Goal to develop urban forms that avoid economic and social polarization promotes the regional strategic goal of minimizing social and geographic disparities and of reaching equity among all segments of society. The evaluation of the proposed project in relation to the policy stated below is intended guide direction for the accomplishment of this goal, and does not infer regional mandates and interference with local land use powers.

- 3.24 *Encourage efforts of local jurisdictions in the implementation of programs that increase the supply and quality of housing and provide affordable housing as evaluated in the Regional Housing Needs Assessment.*

F-19

SCAG staff comments. The Draft EIR, in Section 3-A (Land Use Compatibility) provides a discussion on residential land uses. The discussion suggests that there is the potential for 78,952 units at buildout, or an increase of 66,811 units over the long term. The Draft EIR, however, does not provide a discussion on programs that could increase the supply and quality of housing and the provision of affordable housing. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive or detracts from the achievement of this policy. Based on the information provided in the Draft EIR, the Project is partially supportive of this ancillary RCPG policy.

- 3.27 *Support local jurisdictions and other service providers in their efforts to develop sustainable communities and provide, equally to all members of society, accessible and effective services such as: public education, housing, health care, social services, recreational facilities, law enforcement, and fire protection.*

SCAG staff comments. The Draft EIR, in Section 3-L (Public Services and Facilities) acknowledges that the potential build out of the General Plan would have impacts on schools, libraries, police and fire protection, health care facilities and services. Mitigation measures are recommended to address impacts to services. The Project is supportive of this ancillary RCPG policy.

F-20

AIR QUALITY CHAPTER CORE ACTIONS

The Air Quality Chapter (AQC) core actions that are generally applicable to the Project are as follows:

- 5.07 *Determine specific programs and associated actions needed (e.g., indirect source rules, enhanced use of telecommunications, provision of community based shuttle services, provision of demand management based programs, or vehicle-miles-traveled/emission fees) so that options to command and control regulations can be assessed.*

SCAG staff comments. See SCAG staff comments for policy 4.02. The Draft EIR, in Section 3-I (Air Quality), includes a number of mitigation measures that encourages the implementation of measures that focuses on trip reduction, improving traffic flow, pedestrian movement, biking, public transit and utilizing alternative methods of transportation. The Project is consistent with this core RCPG policy.

F-21

- 5.11 *Through the environmental document review process, ensure that plans at all levels of government (regional, air basin, county, subregional and local) consider air quality, land use, transportation and economic relationships to ensure consistency and minimize conflicts.*

SCAG staff comments. The Draft EIR, in Section 3-I (Air Quality) discusses the consistency of the proposed Project with regional and local air quality policies and includes mitigation measures for impacts to air quality. The Project is consistent with this core RCPG policy.

F-22

WATER QUALITY CHAPTER RECOMMENDATIONS AND POLICY OPTIONS

The Water Quality Chapter core recommendations and policy options relate to the two water quality goals: to restore and maintain the chemical, physical and biological integrity of the nation's water; and, to achieve and maintain water quality objectives that are necessary to protect all beneficial uses of all waters.

11.07 *Encourage water reclamation throughout the region where it is cost-effective, feasible, and appropriate to reduce reliance on imported water and wastewater discharges. Current administrative impediments to increased use of wastewater should be addressed.*

F-23

SCAG staff comments. The Draft EIR does not provide a discussion on reclaimed water. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive or detracts from the achievement of this policy. Based on the information provided in the Draft EIR, we are unable to determine if the Project is consistent with this core RCPG policy.

OPEN SPACE CHAPTER ANCILLARY GOALS

Outdoor Recreation

9.01 *Provide adequate land resources to meet the outdoor recreation needs of the present and future residents in the region and to promote tourism in the region.*

F-24

SCAG staff comments. The proposed Project provides for approximately 14,120-acres of open space for park facilities, golf courses, open space and watercourse. The Project is supportive of this ancillary RCPG goal.

9.02 *Increase the accessibility to open space lands for outdoor recreation.*

F-25

SCAG staff comments. See SCAG staff comments for goal 9.01. The Project is supportive of this ancillary RCPG goal.

9.03 *Promote self-sustaining regional recreation resources and facilities.*

SCAG staff comments. The Draft EIR does not discuss the subject of self-sustaining regional resources and facilities. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive or detracts from the achievement of this policy. Based on information

F-26

provided in the Draft EIR, we are unable to determine if the Project is supportive of this ancillary RCPG goal.

F-26

Public Health and Safety

- 9.04 *Maintain open space for adequate protection of lives and properties against natural and man-made hazards.*

SCAG staff comments. The Draft EIR does not discuss the subject of open space for the protection of lives against natural and man-made hazards. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive or detracts from the achievement of this policy. Based on information provided in the Draft EIR, we are unable to determine if the Project is supportive of this ancillary RCPG goal.

F-27

- 9.05 *Minimize potentially hazardous developments in hillsides, canyons, areas susceptible to flooding, earthquakes, wildfire and other known hazards, and areas with limited access for emergency equipment.*

SCAG staff comments. See SCAG staff comments on policies 3.22 and 9.04. The Project is partially supportive of this ancillary RCPG goal.

F-28

Resource Protection

- 9.08 *Develop well-managed viable ecosystems or known habitats of rare, threatened and endangered species, including wetlands.*

SCAG staff comments. See SCAG staff comments on policy 3.20. The Project is consistent with this core RCPG goal.

F-29

CONCLUSIONS

1. As noted in the staff comments, the Draft Environmental Impact Report for the City of La Quinta Comprehensive General Plan Update is consistent with or supports many of the core and ancillary policies in the Regional Comprehensive Plan and Guide.

Based on the information in the Draft Environmental Impact Report, we are unable to determine whether the Project is consistent with core policies 3.03, 4.01 and 11.07. The Project is also partially consistent with core policy 3.01. Based on the information in the Draft Environmental Impact Report, we are unable to determine whether the Project is supportive of ancillary policies 3.12, 3.13, 9.03 and 9.04. In addition, the

Project is partially supportive of ancillary policies 3.24 and 9.05.

2. As noted in the Summary of SCAG Staff Comments, the Final EIR should address the relationships (consistency with core policies and support of ancillary policies) to SCAG's Regional Comprehensive Plan and Guide and discuss any inconsistencies between the proposed project and applicable regional plans.

F-30

3. All feasible measures needed to mitigate any potentially negative regional impacts associated with the proposed project should be implemented and monitored, as required by CEQA.

F-31

THE VISTA SANTA ROSA ASSOCIATION

G

ELLEN LLOYD TROVER, PRESIDENT
PHILIP BURNETT, VICE PRESIDENT
BETTY MORGIN, SECRETARY
ELIZABETH L. TALLEY, TREASURER
BETTY MANGAN SMITH, DIRECTOR
EDWARD GRANADOS, DIRECTOR

82-836 BECKMAN DRIVE
THERMAL, CA 92274

September 9, 2001

Mr. Fred Baker
Principal Planner
City of La Quinta
78-495 Calle Tampico
La Quinta, CA 92253

Sent via FAX to Nicole Sauviat Criste at 760 322-2760

Original to be sent via US Mail

RE: Comments on Draft Environmental Impact Report (SCH Number 2000091023) for the La Quinta General Plan, Annexation No. 12 and Sphere of Influence

Dear Mr. Baker:

On behalf of the Vista Santa Rosa Association, a non-profit organization devoted to dissemination of voter information and the social welfare of the area known as Vista Santa Rosa, we are submitting comments, under separate cover, on the Draft Environmental Plan from two experts Matthew Wiedlin and Gary Mitchell & Associates. Additionally, I would like to make the attached comments that cover some of the areas of concern of our residents.

We are concerned not only about the impact of the General Plan on the areas east of the current City limits of La Quinta, but also the cumulative impact of the Plan on the region, including the current incorporated city.

G - 1

Sincerely yours,

Ellen Lloyd Trover
Ellen Lloyd Trover, President

www.vistasantarosa.com
etrover@ix.netcom.com

Comments on Draft Environmental Impact Report (SCH Number 2000091023) for the La Quinta General Plan, Annexation No. 12 and Sphere of Influence; submitted on behalf of the Vista Santa Rosa Association

As a general observation, it is our opinion that there is insubstantial evidence presented and inadequate analysis of Project Alternatives. With respect to the "Preferred Plan:"

G - 2

Section III A&B: Land Use and Agricultural Resources: It is our opinion that the Low Density and Very Low Density designations for the land east of the city limits would encourage urban sprawl which is specifically discouraged by State Statute. Furthermore, the absence of any specific wording of the "Agricultural Overlay" makes it impossible to determine and analyze the impact on existing land uses. It is our belief that the wording of Agricultural Overlay may significantly limit the current agricultural uses, especially for animal husbandry. Furthermore, it appears that home occupancy business uses under the city plan would be more restrictive than the current regulations under Riverside County zoning regulations, and the resulting impact is not addressed in the Draft EIR.

G - 3

G - 4

An additional issue of concern is that the "Kohl Ranch" development is not included in the Agricultural Overlay which means that if the City should annex that area also, it could not be continue to be cultivated pending development.

G - 5

The entire premise of the General Plan and Draft EIR seems to be that the areas east of the city limits will be developed at an average of 3 units per acre at a fairly steady pace; however, as the economy of the region would be drastically altered by the conversion of agricultural land to "country club" or standard subdivisions, the impact on the region is not adequately addressed.

G - 6

Additionally, the report states that "Farmers and ranchers may be exposed to increased noise associated with household mechanical equipment and traffic generated by new residences. Residents of low-density developments may be exposed to operational noise generated by farm equipment, odors from farm animals and organic or chemical crop applications, and airborne sand and/or dust generated by plowing and harvesting activities." The mitigation measures on these issues are inadequate to address the problems.

G - 7

On page III-140, the draft EIR states: "Land use incompatibilities may arise where urban and agricultural lands are adjacent to one another. Fugitive dust generated by disking, plowing, and other agricultural operations could create a nuisance for neighboring development, and fugitive dust generated during the grading and construction phases of new development could adversely impact neighboring farmlands." A 100 foot buffer would be inadequate to prevent these incompatibilities as anyone who has been in the Coachella Valley on a breezy, not even windy day, can attest.

G - 8

At the very least, the City should adopt a "Right to Farm" ordinance.

Section III C: Traffic/Circulation:

It is our opinion that the Plan is inadequate as it indicates that "most" of the roadway segments will operate as Levels of Service "D" on buildout of the proposed General Plan. Additionally, the need to move tractors and other agricultural equipment is not adequately analyzed, nor are the provisions for regional horse trails, and their impact on circulation taken into consideration. Certainly one of the glaring problems with traffic plans in the City is the recent installation of the traffic circle at Ave. 52 and Jefferson Streets which has potential catastrophic consequences for anyone attempting to transport horses, other livestock, or heavy equipment via trailer through the intersection.

G - 9

Section D. Soils & Geology:

The General Plan's anticipated buildout at an average of 3 houses to the acre is excessive and irresponsible until, and unless, the dangers of collapsible soils and ground subsidence are demonstratively solved. Although CVWD has operated a pilot recharge facility, it is still in the experimental stage and even if successful, a full-scale facility is years in the future. Indeed, CVWD has just received a grant from the State for further study.

G - 10

The issue of wind erosion and damage from blowing sand are grossly under-rated. Reduction of the flood potential of the Whitewater River will not solve the existing conditions.

G - 11

While improved building codes have reduced the potential for collapse of buildings and deaths as a result of seismic activity, significant damage to structures, city infrastructure, and community social life are inescapable in the event of a major tremor. The Draft EIR anticipates "a 22% probability of the San Andreas Fault generating a magnitude 7.0 earthquake before the year 2024" and "the slip rate of the San Jacinto fault is estimated at between 7 and 17 mm/year, and is capable of generating magnitude 6.5 to 7.5 earthquakes." Added to the initial impact of the tremor are liquefaction, settlement, slope instability, and inundation. All of these issues are inadequately analyzed and mitigated, not to mention their cumulative impacts. To encourage urbanization of an area subject to these factors is insupportable.

G - 12

Section E & F. Hydrology & Water Resources/Quality:

As shown above, the Draft EIR fails to view the hydrology issues in the context of cumulative impacts. At the present time, residential development will place an additional burden on the over drafted water table, as residential uses (including potable water) are served by water pumped from the aquifer.

G - 13

The engineering firm for the Coral Mountain Project analyzed the water supply demands of that project, which is a country club/residential development of the type that can be anticipated to be built throughout the annexation and planning area. They calculated that development alone would contribute an additional average demand of 1.8 acre feet per acre per year on the groundwater. That project is only the "tip of the iceberg."

G - 14

The residents of the Vista Santa Rosa have reported that the water levels in their wells have been dropping for years, with a significant acceleration of the rate since PGA West was approved. The draft Coachella Valley Water Management Plan states that groundwater demand

G - 15

in the lower valley currently exceeds recharge by 41,700 acre feet per year and that groundwater levels have decreased 60 feet or more in some parts of the lower valley; our residents can verify those findings from empirical experience.

The draft Water Management Plan states that "it is clear that the continued decline of groundwater levels is unacceptable" and that "the continued overdraft will have serious consequences for the Coachella Valley". Short term impacts include increased groundwater pumping costs, and the cost of deepening wells and installing larger pumps. "Continued decline of groundwater levels could result in a substantial and possibly irreversible degradation of water quality in the groundwater basins."

Areas of the lower Coachella Valley are already experiencing subsidence caused by excessive groundwater overdraft. As the water in the aquifer is depleted, the space between soil particles is lost, which leads to compaction, which CVWD representatives admit could permanently reduce the capacity of the aquifer. If capacity is diminished, even if a way to recharge the aquifer is found, its ability to receive the water will be significantly reduced or lost. As stated above, CVWD has not proven the physical ability to adequately recharge the aquifer. Indeed, the CVWD Draft Water Management Plan states "the maximum amount of potential recharge in the lower valley is not known at this time."

G - 15

Additionally, this Water Management Plan is itself only a draft, the EIR not to be issued until late in 2001, then it must undergo comment, Public Hearing, and must be adopted by more than one agency; it also seems fated for challenge in court. There is no guarantee that the plan will be adopted as currently written, when it will be implemented, that it will be successful, or if it does stop the overdraft that it will do so in time to prevent significant subsidence.

The draft Water Management Plan notes that the Coachella Valley does not currently have water rights to imported water sufficient to satisfy its current and future demands. The issue of imported water is especially complex as seven states share the Colorado which, like all rivers, is subject to reduced water capacity due to climatic conditions. While CVWD has made an outstanding attempt to acquire additional sources, those efforts have not yet reached fruition. Major urban areas like Los Angeles and Phoenix may not have the "federal water priority" of the Coachella Valley water project, but it is a political reality that such concentrations of population and industry vital to the economic health and defense capability of the nation will have their basic needs placed in higher priority for delivery, although probably not price.

The State is under directive from the Secretary of Interior to reduce its use of Colorado River Water by nearly 1,000,000 acre feet annually. If this area does not significantly increase its conservation of water, even without growth, we may have our current allotment reduced. While an argument is made that an acre of agriculture uses the same amount of water as an acre of golf course, or an acre of residential use, that does not mean: that each of these uses depends on water from the same sources; that it could or would be recycled the same way; that the drainage impact on the Salton Sea, a federal concern, would be the same; that the development of currently non-farmed land would not increase the demand on the water supply; that the impact on the nation's food supply would be the same, etc. The effects of urbanization of the planned area are far, far more complex than what is addressed in the draft EIR and any plan based upon this report is

G - 16

fatally flawed.

G - 16

Section III G. Biological Resources:

While extensive coverage has been given to the biological resources and concerns. This is a regional issue, and development of a plan for expansion of the city is premature until CVAG completes its study. Many forms of animal life can and do co-exist with existing agricultural use of the land which cannot exist with urbanization. Personal observation has acquainted me with the objections of residents of one local country club to the use of their swimming pools, etc. by birds protected by the federal migratory wildlife laws. These same birds cause no problems when they use agricultural reservoirs.

G - 17

Section III H. Cultural Resources.

As stated in the EIR, La Quinta contains "one of the most dense concentrations of archaeological sites in California." Additionally, since 1981, "over 120 historic buildings and sites have been recorded in the General Plan planning area." Farming may "turn" the land, but does not pulverize artifacts as development would, as a result the area is culturally extremely sensitive. Additional studies would be necessary to determine to what extent urbanization would destroy sites that future generations could more adequately preserve and/or document. Additionally, the Torres-Martinez and Augustine tribes should be consulted regarding planned urbanization. Until and unless potential impact studies and adequate mitigation measures are developed, the area of potential development should not be expanded.

G - 18

Section I. Air Quality:

As stated in the draft EIR, "winds suspend and transport large quantities of sand and dust, which can reduce visibility, damage property and constitute a significant health threat." Additionally, the "Coachella Valley is also susceptible to air inversions, in which a layer of stagnant air is trapped near the ground where it is further loaded with pollutants. When combined with chemical aerosols and other pollutants emitted by automobiles, furnaces and other sources, this process can result in substantial haziness and a deterioration in ambient air quality." The mitigation measures are inadequate in addressing these conditions.

G - 19

Section J. Noise:

Merely looking at the chart on page III-150, leads one to know that the impacts of the General Plan are staggering. Anyone who has visited a large urban area knows that it would be impossible to maintain acceptable noise levels when increasing the size of a city from approximately 24,000 to 207,000.

G - 20

Section K. Visual Impacts:

The impact of the planning is difficult to access when viewed in light of the recent decisions of the City Council to allow a significant variance for the new hotel from its "Cove" height restrictions, and to allow a berm of up to 19' tall on Avenue 54, a street that was to be designated

G - 21

an agrarian corridor. The mitigation measures indicate the "City shall establish and implement urban design standards which protect scenic viewsheds and enhance community cohesion." Absent precise wording on these standards and guarantees that the standards will be followed, it is impossible to analyze the impact of the new General Plan.

G - 21

Section L. Public Services and Facilities:

This entire section is based upon conjecture about future development of a huge land area.

G - 22

Significant developer fees or new community facilities districts would be necessary to adequately provide for the increase student population.

G - 23

The city library is currently significantly under-served by County standards, which even with the new building plans, would be exacerbated by the buildout and the plan is vague on its correcting these problems.

G - 24

Policing, fire protection and healthcare projections are woefully inadequate and likely to remain so with the fiscal shortfalls projected in the draft EIR.

G - 25

One again, the plan covers too large an area to adequately project and plan for waste water disposal.

G - 26

Basically, the planning area is simply too large for adequate planning of infrastructure for a city of the size of La Quinta. Far too many projections are based on "developer fees" and not on sustainable revenue sources. Maintenance of services must be an extreme consideration when the buildout of Annexation No. 12 would result in an annual revenue shortfall of approximately \$5,387,982, and buildout of the SOI amendment would result in a negative annual shortfall of \$1,998,748.

G - 27

The draft EIR fails to adequately address the current problems inherent in the infrastructure of the City much less the problems that will develop if additional area is annexed with the resulting shortfalls; at the very least, a new EIR should be required for any annexations or changes of Sphere of Influence as the current draft does not only fail to fully analyze alternative plans, it also fails to analyze the impact of changed land use on the regional economy. The fatal flaw of the General Plan and draft EIR is the proposed development and enlargement of a city that already has significant problems, including the fact that approximately 49% of the land within the city limits has not been developed despite a State policy to discourage urban sprawl.

G - 28

For all of these reasons, and those submitted by Mr. Wiedlin and Mr. Mitchell, it is our opinion that the Draft EIR is significantly inadequate to serve as an environmental impact report for any additional annexations or expansion of the City's Sphere of Influence to the east of the current city limits.

G - 29



1515 SIXTH STREET • COACHELLA, CA 92235

Fax: (760) 398-6117

Administration 398-3502
Animal Control 398-4978
Building 398-3007
City Clerk 398-3502
City Council 391-5009
Code Enforcement 398-4978
Economic Develop. 398-5110
Engineering 398-5744
Finance 398-3502
Fire 398-8895

Grants 398-5110
Housing 398-5110
Personnel 398-3502
Planning 398-3102
Public Works 398-5744
Recreation 398-3502
Riverside Sheriff's Office 853-8990
Sanitary 391-5006
Senior Svs. 398-0104
Utilities 398-2702

H

September 10, 2001

Mr. Fred Baker
Principal Planner
City of La Quinta
78-495 Calle Tampico
La Quinta, CA 92253

Subject: Comments on the Draft Environmental Impact Report (SCH Number 2000091023) for the La Quinta General Plan, Annexation No. 12 and Sphere of Influence Amendment.

Mr. Baker,

The City of Coachella is pleased to have received a copy of the above referenced document for review and comment. Staff has conducted an initial review of the DEIR and forwards comments for your consideration. Staff had requested an extension to October 3, 2001, to allow time for the City Council of the City of Coachella to review staff comments prior to submission to you. Since that request was not granted, the staff comments are being forwarded to you by your September 10th deadline. Additional comments may be submitted at your hearing. Review by the City Council of the City of Coachella will not occur until their meeting of September 26, 2001, at which time comments will be forwarded to you.

H - 1

The proposed General Plan Planning Area, including proposed Annexation Area No. 12 is an ambitious one, that could potentially result in significant impacts to the City of Coachella in several areas of concern.

H - 2

Agriculture

The preservation of the agrarian and equestrian lifestyle and resources within the south-central and southeastern portion of the Planning Area is of major concern. Resulting loss of agricultural lands and resources through conversion of existing agricultural lands to residential land uses could pose a significant threat to the traditionally strong economy of the Coachella Valley. Preservation of these areas is vital to the economic well-being of the agricultural community of the Coachella Valley. From a preservation standpoint, the proposed Agricultural Overlay (as depicted in the Recommended Alternative and Alternative II) is extremely important to include in the general plan. It is understood that the

H - 3

proposed Agricultural Overlay will allow current agricultural land uses to continue until the property owner chooses to develop the land. However, it is not clear whether vacant agricultural lands will be allowed to begin agricultural activities at the property owners' discretion.

H - 3

The proposed 100-foot minimum buffer between agricultural land uses and proposed residential areas and other land uses seems too little to realistically mitigate the typical agricultural activities (pesticides, fertilizers, dust, noise, odors, etc.) upon residential areas. Some crops require activities and techniques done at night-time and early morning hours, using both manual labor and machinery that can be quite noisy at 100-feet away. Rather, it is suggested that a minimum 300 to 500 foot buffer might be considered a more adequate mitigation measure.

H - 4

Preservation of the equestrian lifestyle in the Planning Area should be a priority to retain existing equestrian properties and to provide for the development of new properties as desired by property owners.

H - 5

Traffic and Circulation

With a 113% increase in dwelling units (at 75% maximum densities at build-out) there will be significant impacts to the local roadway system and to airport traffic, with increased daily trips and airport service expansion. The projected increase in residential, commercial and industrial vehicular traffic, will potentially overburden roadways, bridges, and intersections adjacent to and within the City of Coachella. Specific mitigations such as improvements to the streets, interchanges, bridges, and grade-separations are not identified in the Draft EIR making it impossible to identify the level of significance of the impacts after mitigation. This needs to be corrected prior to the adoption of the EIR. Furthermore, Level of Service D is not acceptable as the standard LOS for most areas within the City of Coachella as is currently proposed in the DEIR.

H - 6

Water

Considering the high number of dwellings proposed by the Recommended Alternative, the consumption of water and water availability is of major concern on a valley-wide scale, given the current overdraft condition. This begs the question of whether there is enough water for the projected growth in the Planning Area. The 55% reduction in water consumption at build-out as described for Alternatives I and II are preferable to that described for the Recommended Alternative.

H - 7

There is also concern for water quality, as each alternative discussed in the document results in additional urban development and potentially new pollutants to the groundwater supply. It is agreed that conversion from private septic systems to a sewer system could reduce the threat of groundwater contamination. Additional discussion of potential impacts to water supply and systems adjacent to the Planning Area should be included, especially as it impacts the City of Coachella.

H - 8

Air Quality

It is clear that there could be significant adverse impacts to the local air quality from the build-out of the proposed Planning Area under all project alternatives. Traffic emissions, site disturbance, grading and construction activity, and increase in utility consumption will lead to an increase in air pollution for the valley.

H - 9

Soils/Geology

Projected development within the Planning Area under any of the project alternatives will result in a significant increase in population which will be subject to potential seismic and geological hazards.

H - 10

Hydrology

Projected development of the Planning Area under any of the project alternatives will result in the need for additional flood protection facilities and improvements.

H - 11

Biology

Projected development of any of the project alternatives could result in potential adverse impacts to wildlife and native plants. Exotic plant species will be introduced into the areas as development occurs that could dominate plant communities. Domestic pets could intrude into remaining natural habitat areas and adversely impact wildlife.

H - 12

Noise

There will be an increase in various noise generators in the proposed Planning Area that could adversely impact the Planning Area as well as adjacent communities. Vehicular traffic will be the dominate source of the noise impacts. There could be incompatibilities and conflicts between agricultural land uses and proposed residential land uses if a larger buffer area is not required.

H - 13

Land Use

The proposed Recommended Alternative will result in a 113% increase in dwelling units at build-out (at 75% maximum densities) which is a significant increase in dwelling units and population for this area. Alternative II will result in 41,605 fewer dwelling units than the Recommended Alternative and correspondingly result in fewer adverse impacts between land uses within the proposed Planning Area and adjacent communities.

H - 14

Cultural Resources

The City of La Quinta has a wealth of prehistoric and historic resources that should be given the highest level of consideration before they are adversely impacted by the

H - 15

proposed development strategy. Avoidance should be the preferred alternative for preserving these resources wherever possible.

H - 15

Visual

There is a potential for significant adverse impacts to vistas and views of the Santa Rosa Mountains, from the City of Coachella, if stringent controls are not placed upon projected development within the proposed Planning Area. The undergrounding of utilities should be a priority within the proposed Planning Area. Wireless communication towers and monopoles, utility towers and poles, signs, and multi-story buildings, should be subject to strict development standards that will ensure minimal impacts to viewsheds. The City of Coachella requests building heights be limited to protect view corridors of the local mountains from properties within the La Quinta.

H - 16

Public Services/Facilities

The City of La Quinta is currently underserved in fire, police, and library services. With such a large proposed Planning Area, it will be critical that adequate services are provided as development occurs so that there will not be adverse impacts upon adjacent communities and their service resources.

H - 17

Socio-economics

Adverse impacts to the agricultural and equestrian lifestyles is potentially significant unless the proposed Agricultural Overlay is adopted as indicated in the Recommended Alternative and Alternative II. There has been a lengthy tradition of these lifestyles in the south-central and southeastern areas of the Planning Area.

H - 18

Additional Information

Environmental Summary Matrix:

The Environmental Summary Matrix does not include a column for the discussion of significance after mitigation for each issue area. Without this information, how can over-riding findings be made?

H - 19

There is no discussion about impacts and mitigation measures under Traffic/Circulation for the Desert Resorts Airport.

H - 20

Significance levels are not clearly stated for several of the areas of concern. These should be added to the document and to the Project Impacts column of the matrix.

H - 21

Discussion needs to be added to the DEIR that identifies specific impacts to the Cities of Indio and Coachella, and quantifiable mitigation measures.

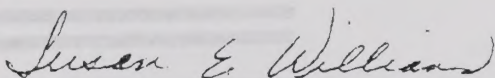
H - 22

The energy crises needs to be discussed in the DEIR, including both electrical supply and natural gas resources.

H - 23

Additional comments may be forthcoming as staff continues our review of the DEIR. Should you have any questions regarding this letter, please do not hesitate to contact Leslie Hudson, Associate Planner, who can be reached at (760) 398-3102 x 242.

Very truly yours,



Susan E. Williams
Director of Community Development

cc: Byron L. Woosley, City Manager

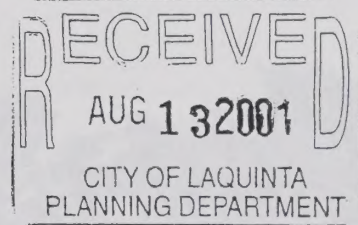
Attachment:

- Page I-13: Table I-2, Land Use column, O Office84, Is this a typo? [REDACTED] H - 24
- Exhibit III-1: City of La Quinta, Existing General Plan. This exhibit is confusing with the County designations included. [REDACTED] H - 25
- Page III-16 is printed twice. [REDACTED] H - 26
- Page III-21: paragraph 1, line 1, "of" should be or. [REDACTED] H - 27
- Pages III-26: Indirect Environmental Impacts section should include discussion on specific impacts to the Cities of Indio and Coachella. [REDACTED] H - 28
- Pages III-91 and 92: Is there a conflict with the number of dwelling units indicated on Page 91, paragraph 5, line 2, "78,952 dwelling units...", and Page 92, paragraph 5, line2, "...66,811 new dwelling units" ? [REDACTED] H - 29
- Page III-121: paragraph 4; consider stating that the City was actually certified as a CLG in April of 1995; Also, the reference to Appendix K is obsolete. [REDACTED] H - 30
- Page III-143: Subsection Q, should include the requirement that truck loads be covered. [REDACTED] H - 31
- Page III-166: paragraph 1, this discussion should be updated as the Mountain Vista School opened September of 2000 and is in full operation. [REDACTED] H - 32
- Page III-170: Existing Conditions, Since the existing library in La Quinta is currently undeserved, and the proposed new library will not meet the planning standard, will there not be an impact upon other adjacent libraries? [REDACTED] H - 33
- Page III-185: paragraph 1, line 2, GTE is now Verizon. [REDACTED] H - 34
- Pages III-185-186: Electricity: Consider adding a discussion under Existing Conditions on the current power crises and the proposed power plants in the valley. [REDACTED] H - 35
- Pages III-188-189: Natural Gas: Consider adding a discussion regarding the current supply of natural gas in light of the power crises under Existing Conditions. [REDACTED] H - 36
- Page III-195: Table III-41: Why are employers outside of the City of La Quinta included in this table when the title indicates that they are inside the City boundary? [REDACTED] H - 37
- Page V-9: Table V-2: The Commercial Subtotals on this table and Table V-3 are different. Is there a reason? [REDACTED] H - 38

THE CITY OF
INDIAN WELLS
CALIFORNIA

I

August 9, 2001



Fred Baker, Principal Planner
CITY OF LA QUINTA
78-495 Calle Tampico
La Quinta, California 92253

**RE: DRAFT ENVIRONMENTAL IMPACT REPORT (SCH NO. 2000091023) FOR THE LA QUINTA
GENERAL PLAN, ANNEXATION NO. 12 AND SPHERE OF INFLUENCE AMENDMENT.**

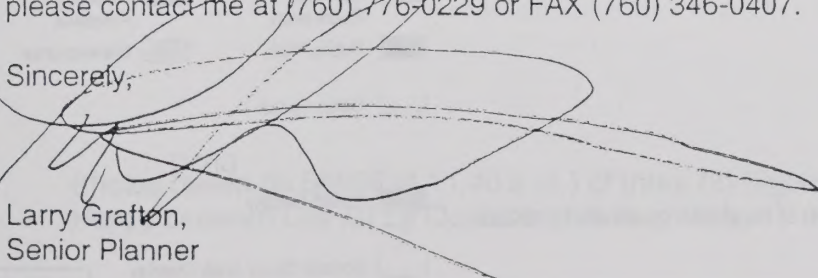
Dear Mr. Baker:

The City of Indian Wells has reviewed the above referenced DEIR relative to possible impacts on the City or surrounding adjacent areas. We offer the following comments for your consideration:

1. The descriptions of the adopted land uses in the City of Indian Wells on Page No. 1-10 and III-7 are inaccurate. The area west of Fred Waring Drive adjacent to the Garden of Champions, is currently zoned for Resort Commercial uses and not Community Commercial. Please see attached exhibit. I - 1
2. The existing hillside areas (between Indian Wells and La Quinta) are not appropriate for the proposed Community Commercial and High Density residential Land Use designations as depicted in the Recommend Land Use Plan illustrated in Exhibit III-2. Any development within this area, as proposed, would severely impact the adjacent residential areas within the City of Indian Wells. A Hillside Overlay designation should be placed on these areas to protect the resources. I - 2
3. As per our prior discussions, staff has observed Peninsular Big Horn Sheep on the hillside area adjacent to Point Happy Ranch. This information should be included in Exhibit III-22. See attached color photos dated 5/9/95. I - 3

We appreciate the opportunity to review and comment on the DEIR. We would like to request that we receive a copy of the Final EIR and General Plan, when it is available. If you have any questions, please contact me at (760) 776-0229 or FAX (760) 346-0407.

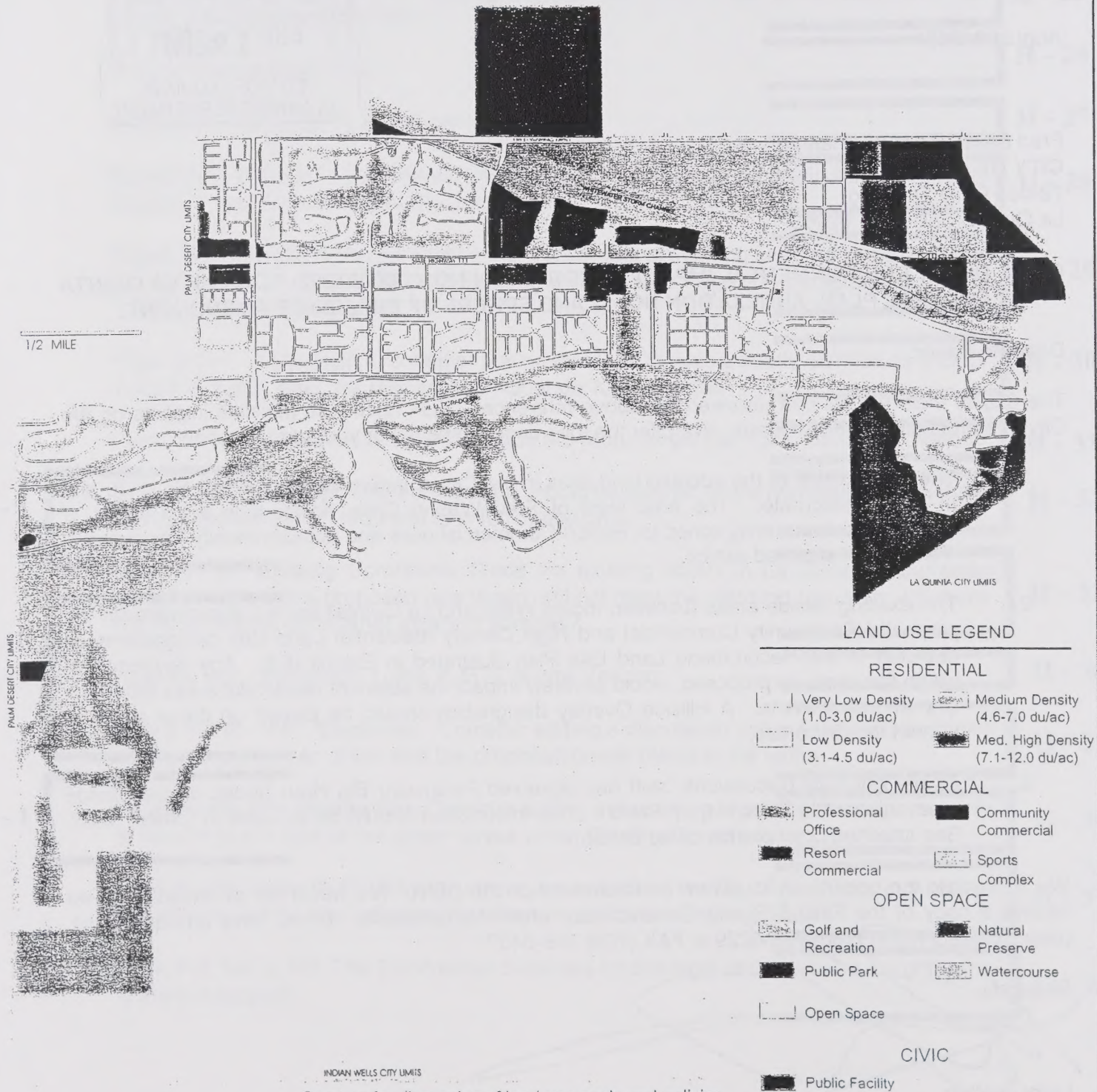
Sincerely,


Larry Grafton,
Senior Planner

LG/bjb

INDIAN WELLS GENERAL PLAN

INDIAN WELLS CITY LIMITS

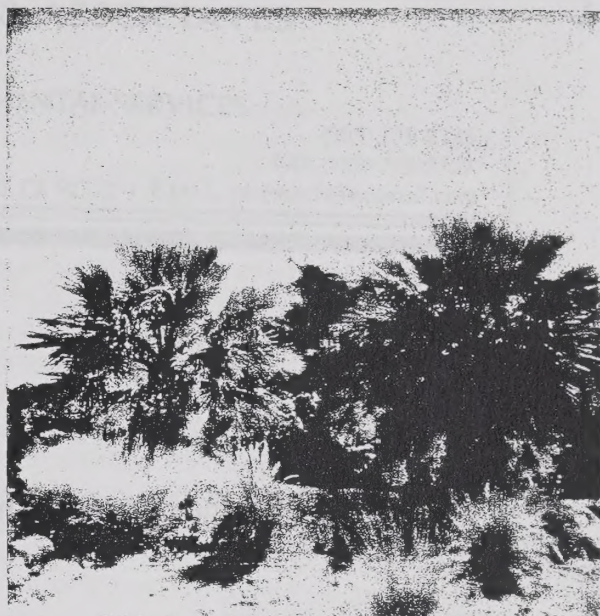


See text for discussion of land use goals and policies.

Source: City of Indian Wells
Updated: November 30th 2000

Land Use Plan

FIGURE
IIA-5



Photos (taken on 5/9/95 at 11:40 a.m.) of three (3) BigHorn Sheep on a ridge adjacent to Point Happy between City Of La Quinta and Indian Wells.



GARY MITCHELL & ASSOCIATES

- LAND PLANNING
- REGISTERED ENVIRONMENTAL SERVICES

(909) 798-3130

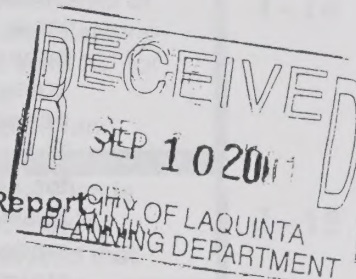
FAX (909) 798-3727

5. E. CITRUS AVENUE, SUITE 207 • REDLANDS, CA 92373 • E-MAIL garemitch@hotmail.com

J

September 10, 2001

Mr. Fred Baker, Principal Planner
City of La Quinta
78-495 Calle Tampico
La Quinta, CA 92253



**SUBJECT: Comments Regarding Draft Environmental Impact Report
(SCH Number 2000091023)**

Dear Mr. Baker:

I have been retained by the Vista Santa Rosa Association to provide you with the following comments relative to this draft Environmental Impact Report. The following is based upon my review of the draft EIR and draft Comprehensive General Plan, annexation area, and proposed expansion of your City's Sphere of Influence.

Specific Questions & Issues to be Addressed

- The proposed project represents a fundamental transformation from a low density, equestrian-oriented and agricultural-related pattern of land uses which have existed for many decades to a highly developed urban pattern of land use allowing up to 16 dwelling units per acre. The socioeconomic impacts of this project to the existing community have not been adequately addressed by this draft EIR. J - 1
- Analysis of required project alternatives, (including "no project"), are ranked as having similar impact levels to various environmental resources. This statement deserves to have greater description and needs to be able to justify this blanket conclusion. J - 2
- The draft EIR does not adequately assess the fiscal impacts of this project upon the community. No fiscal impact analysis has been provided that specifically addresses the direct as well as indirect fiscal costs and benefits of the proposed project. The public infrastructure investment to support the magnitude of the proposed development is enormous in comparison to the maintenance of current development intensity. If the draft EIR is correct in its projected budget shortfall of \$ 5.387 Million per year, then how can the "no project" alternative be dismissed as to fiscal impact analysis? Furthermore, if this fiscal assessment is accurate, then what incentive is there for the City of La Quinta to pursue the proposed development, annexation, and expanded City General Plan planning area? J - 3
- The noise impact analysis appears to be inadequate as to the expected growth of the Thermal Airport. The noise contours depicted in the draft EIR appear to have been borrowed from previous studies which were prepared with the assumption that the current low-density agricultural land use pattern would be continued. The incremental increase of permitted development J - 4

proposed, (up to 16 dwelling units per acre), would be expected to have more severe impacts from noise as the Thermal Airport continues its expansion and air traffic volume.

J - 4

- Loss of prime agricultural land and production area will be very substantially and negatively impacted by this project. The draft EIR does not adequately assess these impacts, nor does it provide effective environmental mitigation measures to lessen these impacts. Loss of prime, productive agricultural lands is a permanent impact with long-term implications. Agricultural soils cannot be reclaimed for future use; therefore the assessment of the preservation and enhancement of prime agricultural soils is vital to the assessment of this project and its impacts to the community.

J - 5

- The anticipated real effects to current residents and landowners concerning the keeping of horses, raising of agricultural crops, and operation of businesses related to open space have not been assessed. There is inadequate provision made for the "grandfathering" of current land uses, structures, and investments made by the many farming businesses and others who have lived in the community for many years.

J - 6

- There is no environmental analysis reviewed which speaks to the issue of how a proposed development project can attain a density of up to 16 dwelling units per acre. In lieu of such development standards, the draft EIR must assume a "worst case" development scenario of 16 units per acre for the entire planning area. That analysis has not been done.

J - 7

Summary Matrix

- The area of the proposed build-out is described as 53,498 acres. What is the proposed build-out population, in terms of dwelling units and residents?
- The EIR summary mentions "moderate" increases of residential & commercial uses. What is meant by "moderate"? Define in terms of maximum build-out scenarios, and relate by % to current City of La Quinta land use mix to assess the use of the term "moderate".
- The Summary mentions the proposed General Plan forecasts residential densities up to sixteen units per acre. How is this level of density consistent with the statement "...continue the low intensity development pattern already established in the City"?
- The draft General Plan forecasts 6,280 acres for "very low density residential" development, even though the planning area comprises 53,498 acres. How does the EIR base its statement that land use compatibility is assured by the General Plan?
- Traffic/Circulation impacts are described in a separate study. What is the assumption of traffic operating levels made in that study? Is traffic level "C" being assumed? The EIR describes operating levels at level "D" currently exist in the City of La Quinta. What is being proposed to mitigate this significant adverse impact?
- The traffic/circulation section makes no mention of comprehensive multipurpose trails or related circulation improvements other than a golf cart route system. How can the proposed development be consistent with the environmental character of the area without a trails system linking equestrian

J - 8

J - 9

J - 10

J - 11

J - 12

J - 13

- and jogging areas with other areas located in the City and in adjacent areas, i.e. polo club area?
- The EIR states that "...Less Intensive Alternatives would result in all intersections operating at Level of Service D or better. What is the justification for this conclusion? The EIR seems to suggest that only the intensive development scenario proposed will improve this circulation system. Why wouldn't a lower level of dwelling units and population require a lower level of traffic and circulation improvements? The Indio General Plan, whose planning area is contiguous to the proposed project area, assumes service level "C" for traffic improvements. Has the draft EIR analyzed the effects of the inconsistency between the proposed project and the existing adopted land use plan of a neighboring city?
 - Soils & Geology. The EIR concludes that "...build-out of the General Plan is not expected to significantly increase risks associated with groundshaking and other seismically induce hazards..." What is the evidence analyzed that would support this conclusion?
 - Visual Impacts. What development standards does either the proposed General Plan or draft EIR provide to ensure the preservation of the unique and valuable visual resources of the Santa Rosa Mountains and viewshed?
 - Ground surface disruption will result in substantial wind erosion and related environmental damage to the community. What mitigating measures are proposed to alleviate this unavoidable impact?
 - Hydrology. The EIR states that conversion of low density agricultural land to urban development could result in increased run off." What analysis has been performed that contrasts the project alternatives? The EIR consistently states that "only the Recommended Alternative" would result in acceptable environmental risks, and that impacts of other alternatives would result in the same levels of impact. How is this conclusion supported by a reasonable alternative comparative analysis?
 - Biological Resources. The EIR states that the low-density development (up to 16 dwelling units per acre) pattern proposed by the General Plan is not expected to result in adverse impacts to existing biological resources. What is the justification for this conclusion?
 - Cultural Resources. The EIR mentions several mitigating measures by suggesting that the City might consider adopting historic standards and other non-existing policies relating to preservation of cultural resources. How can these mitigation actions be effective if they are not adopted prior to development?
 - Noise Impacts. The noise estimates for the Thermal Airport development scenario appear to reflect the continuation of historic land use patterns. Has the draft EIR adequately taken into account the proposed urban development scenario as analyzed from noise impacts as are expected at the Thermal Airport continues to grow and experience greater air traffic volumes?
 - Fiscal Impacts. How have the fiscal impacts been addressed without the preparation of a new fiscal impact analysis? The public infrastructure improvements required by this magnitude of development will require substantial investment from both the public and private sectors. The fiscal impacts of this need to be specifically addressed to the "worst-case" development scenario, up to 16 dwelling units per acre. If the draft EIR is accurate in its estimate of an estimated fiscal budget shortfall of \$ 5 Million for

J - 13

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J - 22

the provision public services to support the required level of infrastructure improvements, then how can the EIR dismiss the "no project" alternative?

J - 22

- Agricultural Resources. The Coachella Valley is world-recognized as a leading agricultural production area. Why have existing valuable agricultural soils and production lands not been adequately identified by mapping or other means by this draft EIR?

J - 23

- Biologic Resources. The draft EIR references the preparation of the Coachella Valley Multiple Species Habitat Conservation Plan, (CV MSHCH). Has a separate biological assessment, including field assessment, habitat survey, and field observation been performed for this environmental study? Since this work is currently being undertaken by the public agencies identified, how can the project impacts to existing biologic resources be adequately assessed until the CV MSHH has been adopted?

J - 24

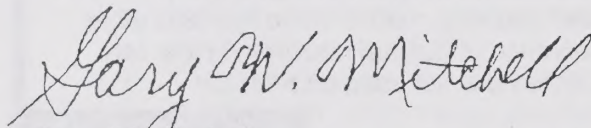
- Water Quality/Resources. The EIR needs to state the comparative demand for water resources and concomitant adverse environmental impacts to be related to the Project Alternatives in a more comprehensive manner.
 - What is the impact of the project to the contamination of the Salton Sea drainage area?
 - Has the EIR taken into account the recent groundwater drainage program utilizing "tiling" for the lower Thermal water sub basin? What are the impacts of the continued use of this water management system to the proposed project?
 - How does the draft EIR analyze the expected impacts of the wastewater effluent to be generated by the project as to existing and future groundwater quality and quantity?

J - 25

On behalf of the Vista Santa Rosa Association, your responses to these comments are both appreciated and are required by the California Environmental Quality Act. I will be most interested in having the opportunity to review your responses and to follow this project carefully.

Thank you for your consideration.

GARY MITCHELL & ASSOCIATES



Gary W. Mitchell

Registered Environmental Assessor



K
Desert Chapter

Building Industry Association
of Southern California

77-570 Springfield Lane
Suite E
Palm Desert, California 92211
760.360.2476
fax 760.772.3372

July 23, 2001

Ms. Nicole Sauviat Criste
Terra Nova Planning and Research, Inc.
400 South Farrell, Suite B-205
Palm Springs, CA 92262

Dear Ms. Criste:

After a careful review of the draft environmental impact report (SCH number 2000091023) for the La Quinta General Plan, Annexation No. 12 and sphere of influence amendment, we have the following comments:

Page M-10 and other sections in the document: You appear to consider data only through 1998 and do not take into consideration that the valley is presently in a serious non-attainment status and in danger of being reclassified as a serious non-attainment area. There is no reference to increased requirements for dust control and more specific dust control plans.

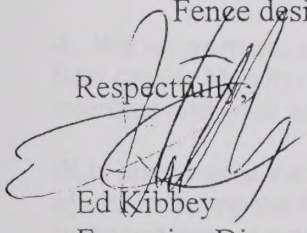
K - 1

Page III-115: Paragraph K is badly worded in that it would require a "barrier" around the entire site, not just that portion that "borders" the hillsides. It would require a "barrier" only if the sheep are "demonstrated to occur on the project site" not on the adjacent hillside. What is the reason for the informal consultation? To provide the basis for need?

K - 2

Fence design?

Respectfully,


Ed Kibbey
Executive Director



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Palm Springs-South Coast Field Office

690 West Garnet Avenue

P.O. Box 581260

North Palm Springs, CA 92258-1260

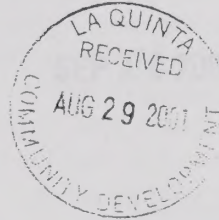


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Visit us on the Internet at
www.ca.blm.gov/palmsprings

IN REPLY REFER TO:
1790C
CA660-28

AUG 28 2001



Mr. Fred Baker
Principal Planner
City of La Quinta
78-495 Calle Tampico
La Quinta, CA 92253

Dear Mr. Baker,

We appreciate the opportunity to review the Draft Environmental Impact Report for the La Quinta Comprehensive General Plan. We would like to offer the following comments.

1. We ask that the plan identify BLM-managed public lands within the City limits as being under the jurisdiction of the BLM and to acknowledge the management responsibilities of the BLM on these lands under Federal Land Policy Management Act of 1976, wilderness designations under the California Desert Protection Act of 1994, and the Santa Rosa and San Jacinto Mountains National Monument Act of 2000. (Page I-3, I-9, II-9, III-7, III-12, III-10, exhibit I-3, Map 2 within Appendix C, Biological Report).

L - 1

2. The city's Hillside Ordinance protects the mountains "above the toe-of-slopes", page VIII-5, which means the alluvial fans would be developed. We suggest that this be considered as an impact to bighorn sheep and as a cumulative impact throughout the Coachella Valley.

L - 2

3. On page III-101, third paragraph, the document states "Projects receiving federal funding will be required to initiate consultation with the USFWS to determine if the proposed activities will adversely modify (bighorn sheep) Critical Habitat." It is our understanding that all projects affecting critical habitat, regardless of the funding source, require consultation with the U.S. Fish and Wildlife Service. In addition, we recommend the addition of bighorn sheep to page IV-3, second paragraph.

L - 3

L - 4

4. We recommend a feral cat control program and dog leash requirements within the Santa Rosa and San Jacinto Mountains Monument to discourage pets from preying on wildlife at the wildland-urban interface and other areas (page III-114).

L - 5

BLM appreciates the efforts of the City of La Quinta in contributing to multi-jurisdictional coordination efforts including the trails working group. We are interested in pursuing additional collaborative management projects consistent with the General Plan and the BLM's planning documents. Please give me a call if you have any questions at (760) 251- 4800. Thanks again for including us in the Draft review process.

Sincerely,

Elena Miguez
Acting for James G. Kenna
Field Manager



US Fish and Wildlife Service
Carlsbad Fish and Wildlife Office
2730 Loker Avenue, West 4775
Carlsbad, CA 92008
(760) 431-9440
FAX (760) 431-5902 + 9618



CA Dept. of Fish & Game
Chino Hills Field Office
Bird Farm Road
Chino, CA 91709
(909) 597-5043
FAX (909) 597-0067

M

In Reply Refer To:
FWS-ERIV-2202.1

SEP 10 2001

Mr. Fred Baker
Principal Planner
City of La Quinta
78-495 Calle Tampico
La Quinta, California 92253

Re: Draft Environmental Impact Report (SCH Number 2000091023) for the La Quinta
Comprehensive General Plan, Annexation No. 12 and Sphere of Influence Amendment

Dear Mr. Baker:

The U.S. Fish and Wildlife Service (Service) and the California Department of Fish and Game (Department) have reviewed the subject document. We provide these comments based on our respective administration of the Endangered Species Act of 1973, as amended (ESA) and the California Endangered Species Act (CESA). Take of listed species is prohibited under section 9 of the ESA and 2080 of the CESA but can be authorized under sections 7 (Federal consultations) and 10 (incidental take and recovery permits) of the ESA, and sections 2080.1, 2081 and 2835 of the CESA.

M - 1

GENERAL COMMENTS

The General Plan area contains a unique assemblage of wildlife and plants, including many declining, endemic, and listed species. For desert floor species dependant upon sandy habitats on the desert floor, the Coachella Valley Fringe-toed Lizard Habitat Conservation Plan and CVAG's multispecies planning effort are primarily focusing on bioregional strategies that would conserve larger blocks of intact habitat in other jurisdictions outside the City of La Quinta. These planning efforts do not include habitat conservation objectives within the City because remaining patches of sandy habitats are becoming too small and isolated for species to survive over the long-term. As such, the plans have and are identifying mechanisms for the City to participate by offsetting the adverse effects of implementing its General Plan by collecting fees to acquire offsite habitats in other areas that have higher probabilities for species' long-term survival.

M - 2

We support the City's proposed adoption of policies that would require surveys for projects that may adversely affect the various species proposed for conservation coverage under CVAG's multispecies planning effort. Though most of these sensitive species are not currently afforded

M - 3

Mr. Fred Baker

2

State or Federal protection, most are endemic to the Coachella Valley and have declined significantly in their distribution and abundance, primarily from habitat loss and degradation. For example, the geographic extent of species dependant upon active sandy habitats have declined historically by over 95 percent in recent decades. The biological information compiled and analyzed by CVAG's multispecies planning program documents current threats and the status of these species relative to their modeled historical distribution. The multispecies program is treating these species as though they were listed by the State or Federal governments and is, therefore, formulating conservation strategies based on the premise that they warrant protection. Therefore, we recommend the City adopt a policy to consider those plants and animals that occur within the City and are proposed for conservation coverage under CVAG's multispecies planning program to be endangered, rare, or threatened species, pursuant to section 15380(d) of the CEQA Guidelines. This would provide the City a more effective mechanism to offset the most severe biological effects of implementing its General Plan and also help assemble a regional habitat reserve system in the Coachella Valley before those opportunities are foreclosed elsewhere.

M - 3

We generally concur with the intent of the draft goals, policies, and programs to conserve biological resources in the draft Comprehensive General Plan (pp. 62-63). However, in many cases, these biological objectives likely will not be realized, given the stated language caveats (e.g., "to the greatest extent practical" and "shall consider requiring") and several zoning contradictions. For example, despite the stated goals expressed in Policy 4, Program 4.1, and Policy 5 (pages 62-63 of the draft Comprehensive General Plan), the proposed zoning/land uses fail to provide for conservation of unique and/or valuable biological resources in several important areas, protection of the Peninsular bighorn sheep, and buffering of sensitive habitats from urban development (see discussion below for more details). The draft EIR briefly discusses the effects of habitat loss on bighorn sheep but does not analyze how the proposed mitigation measures would ameliorate significant impacts. The offered mitigation measures (policies on open space and hillside development) should be analyzed relative to recommended conservation program in the Recovery Plan for Bighorn Sheep in the Peninsular Ranges, California (USFWS 2000). The disparity between implementation of the draft Comprehensive General Plan and the conservation objectives in the Recovery Plan indicate that conflicts with bighorn sheep would be significant and likely would preclude achievement of the recovery objectives for the ewe group in question (see discussion below).

M - 4

Water courses and alluvial fans in the planning area support Desert Dry Wash Woodlands, which represent a rare plant community recognized by the State. This plant community is comprised of several species that are protected under the California Desert Native Plants Act Division 23 of the Food and Agricultural Code (Fish and Game Code Sec. 1925). These desert woodland habitats support a greater diversity and abundance of wildlife than other desert habitat types (England 1984). In addition, these areas also provide critical and essential habitat for the endangered peninsular bighorn sheep.

M - 5

The Department encourages the conservation of these watercourses and opposes their elimination, channelization, or conversion to subsurface drains. All wetlands and watercourses, whether intermittent or perennial, must be retained and provided with substantial setbacks that

Mr. Fred Baker

3

preserve riparian and aquatic values and maintain their value to on-site and off-site wildlife populations. The fluvial channels on alluvial fans are considered regulated water courses.

M - 5

The Department has authority under Fish and Game Code § 1600 *et seq.*, regarding any proposed activity that would divert, obstruct, or affect the natural flow or change the bed, channel, or bank of any water course or body of water. A discussion of potential adverse impacts from any filling, grading, increased runoff, sedimentation, soil erosion, and/or pollutants on water bodies on or near project sites, with mitigation measures to alleviate such impacts, must be provided to meet permit issuance criteria. We, therefore, recommend that the City adopt a policy that would compliment this trust responsibility of the State.

M - 6

SPECIFIC COMMENTS

Page III, 112-113. The section on "Potential Impacts to Mammals" does not adequately address the cumulative effects of building-out the proposed General Plan. The extent of urban development contemplated in the Travertine specific plan and up to 4 units per acre (low density residential zoning) in the adjoining section 5 would eliminate many hundreds of acres of bighorn sheep habitat and introduce high levels of human disturbance into remote and sensitive areas that currently support a stable bighorn sheep population. Zoning at up to 4 units per acre in designated critical habitat conflicts with Biological Resources Policy 5 by not providing for a biologically appropriate transition or buffer between urban land uses and mountainous/alluvial bighorn sheep habitat. To address this conflict, we recommend that the City identify strategies, such as more biologically appropriate zoning, and a habitat acquisition program, for conserving these and other private lands in bighorn sheep habitat that are vulnerable to and zoned for future development.

M - 7

As described in the Recovery Plan, alluvial fans provide important foraging habitat for bighorn sheep, and the numerous canyons draining into the Travertine fan provide important perennial water sources along their lower reaches, as well as lambing and rearing habitat. Increased levels of human recreation, including the focused attraction of humans to desert water sources and oases by the many thousands of new residents supported by the planned urban development (on the alluvial fan in question and throughout the General Plan area at large), likely would be sufficient to displace future bighorn sheep use of Guadalupe, Devil, and Bear canyons, which are critical to maintaining a stable population in the local ewe group. Please refer to the numerous citations in the Recovery Plan that document the adverse behavioral reactions of sheep to human disturbance. Given the inability to replace the functional loss of these scarce, yet critical foraging, watering, lambing, and rearing habitats, the proposed General Plan would reduce the size of the remaining home range of this ewe group, and consequently reduce the capability of the diminished home range to sustain future populations at current levels. Such a population destabilization and associated decline would constitute a significant adverse effect resulting from implementation of the proposed General Plan.

M - 8

Similarly, the recreational and other potential land uses designated for sections 13 and 24, immediately south of La Quinta Cove, have the potential to disrupt bighorn habitat use patterns in

M - 9

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State Dept of Fish & Game (909) 597-0067

p.2

Mr. Fred Baker

4

surrounding areas. For example, the mountainous peninsula bordering the Cove on the east currently is used as lambing habitat, and its use could be discouraged or eliminated if human uses in the area south of the Cove are not properly managed. The draft EIR or subsequent document should more carefully address and offset these significant adverse effects to bighorn sheep.

M - 9

Page III-114, Mitigation Measures. To address our concerns described above, General Plan policies should be adopted that more effectively (1) conserve bighorn sheep habitat and establish strategies or implementation mechanisms to accomplish this objective, such as creation of a habitat acquisition fund, (2) require appropriate avoidance, minimization, and mitigation measures for proposed habitat losses, and (3) require completion of a trails management plan prior to the construction of any further projects in bighorn sheep habitat. The trails plan should be subject to the review and approval by the Service and Department and be coordinated with the trails management program in preparation under CVAG's multispecies planning effort. The plan should include a comprehensive system of appropriate signs, trailheads, management and enforcement capabilities, and other facilities to manage access along the habitat:urban interface to afford effective control of human uses in adjoining bighorn sheep habitat.

M - 10

Page III-115, Item H. The recommended burrowing owl surveys should be expanded to include other habitats in addition to agriculture, given the species' widespread occurrence throughout a variety of habitat types in the Coachella Valley.

M - 11

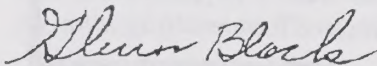
_____, Item K. We recommend that the City modify the mitigation measure and policy to require, not just "consider", a contingency-based measure, as described in the Recovery Plan. Accordingly, for new projects that create a potential attraction to sheep for urban sources of food or water, the City should adopt a policy that would require project-specific conditions of approval for future fence construction should sheep become attracted to urban areas. To be workable, this contingency mechanism should provide the wherewithal to require future construction of a fence if sheep problems arise. Providing the wherewithal would necessitate (1) dedication of a fencing easement, (2) provision of a funding mechanism, and (3) establishment of a responsible party, at the time of project approval.

M - 12

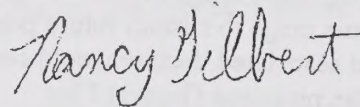
We appreciate the opportunity to comment on the proposal. Please contact Kim Nicol of the Department at (760) 251-4827 or Ken Corey of the Service at (760) 431-9440 if you have questions regarding the issues raised in this letter.

Sincerely,

Sincerely,



Glenn Black
Habitat Conservation Supervisor



Nancy Gilbert
Assistant Field Supervisor

Lee Anderson, Jr.
59-777 Calhoun Street
Thermal, CA 92274

September 10, 2001

N

Mr. Fred Baker, Principal Planner
City of La Quinta
78-495 Calle Tampico
L Quinta, CA 92253

RE: La Quinta EIR

Dear Mr. Baker:

I am taking this opportunity to comment on several issues in the report that may not be addressed by others. These are thoughts that need to be addressed if La Quinta, God forbid, should be able to annex our area. This area is in the county, east of Monroe Street and historically agriculture.

For most cases agricultural and equestrian uses should be interchangeable and I am using that premise in my suggestions.

Agricultural Resources Page M-2:

(1) The report states that the agricultural overlay "provides for continuation of existing agricultural activity at the discretion of the landowner until he chooses to change its use". This is not good enough. Let agriculture be a permissive use in any area, or at least in areas that have The La Quinta designation of very low density and low density uses. Agriculture cannot be protected by an agricultural overlay. It needs its own designation. An agriculture zone should be basic and agriculture should be a permitted use in any area. Landowners and the city need the flexibility to use land for agriculture should an economic downturn slow building development.

N - 1

(2) Under mitigation measures there needs to be added protection for land that is already in agriculture. La Quinta should enact "Right to Farm" legislation similar to that in effect in the Riverside County area.

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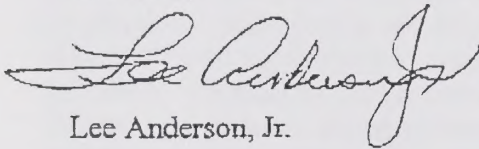
(3) Water Quality Resources Page-M-7:

The study states that it estimates that approximately 40% of domestic water consumed would be reabsorbed into the ground water table. This is not true in the middle valley area due to numerous clay layers that prevent percolation. This is why much of the farming area contains tile lines.

N - 3

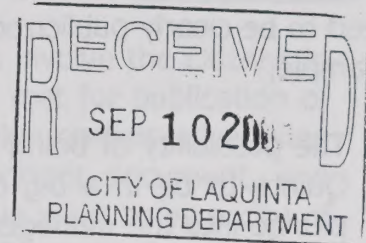
Thank you for considering these comments. I regret that you allowed only an additional two week extension for study. Proper study of a report this big needs more time, especially during the summer months when so many people take vacations.

Sincerely,



Lee Anderson, Jr.

Kay Wolff
P.O. Box 1016
La Quinta, CA 92253
September 9, 2001



O

Mr. Fred Baker, Principal Planner
City of La Quinta
78-495 Calle Tampico
La Quinta, CA 92253

Dear Fred,

I am writing in regard to the draft La Quinta General Plan, Environmental Impact Report, and Master Environmental Assessment. The implications of the Annexation No. 12 and Sphere of Influence issues are quite disturbing, as well as the lack of specificity in the General Plan. In it's current boundaries, the City is projected to face a wonderful economic future (DEIR Tables III-46 stating a projected \$20 million annual net positive cash flow). We are in a position to fulfill the dreams of our residents: wonderful neighborhoods with a high level of safety and varied amenities for all: young and old, rich and not-so-rich. I assume the fulfillment of this dream is the goal of the city staff and the council and commissioners.

The Draft General Plan and DEIR not only appear flawed, but seem to detract from La Quinta's rosy future. I refer to these points:

1. The General Plan does not spell out any general locations, acreage, or percent of acreage for parks, trails or other public use lands. These uses are lumped together with golf courses, which are a) mostly private, b) costly for citizens to use, and c) severely impact our water supply, due to the residences that typically surround them. In order to insure the quality of life of our residents, we need to specifically assure that facilities for youth and adults are abundant and conveniently located. Where are the formulas (minimum expectancies) for parks and open space? Open space needs to be more than mountains and golf courses. We are below our guidelines for public parks within our current boundaries: let's fix that first.
2. The verbs used in the General Plan are too loose: "encourage, try to, evaluate, consider, pursue, etc." How about setting some specific goals? How about some "wills and shalls"? We can afford to be selective and make demands on developers.
3. In order to avoid the negative impacts of water, traffic, noise, pollution, and loss of cultural heritage as pointed out in the DEIR, I believe residential developments should be exclusively "very low density residential" and interspersed with open space and public parks and trails. If developers of high, medium, and low density developments don't like our zoning, let them take their developments elsewhere. We can afford to be picky. Why become a high density community when we are positioned to be the most desirable city in the Coachella Valley?

O - 1

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O - 3

4. The DEIR clearly points out the many negative impacts of the potential annexation of Annexation No. 12 and the Sphere of Influence. These very negative impacts need to be clearly publicized to the community before the passage of any plans. For example,

O - 4

a) The possibility of being a city of some 208,000 is horrifying! Who moved to La Quinta to be in a big city? Let's take good care of what we've got, and not plunge into the managerial and safety morass of a metropolis! Do we want to be considerably larger than San Bernardino?

b) The annexed areas would be a tremendous financial drain on the current city, with an annual negative cash flow of almost \$7 million (DEIR Tables III-46 and 47). Since LAFCo has stated that La Quinta annexation will not be "piecemeal", that implies that we will have safety obligations prior to the development of most properties. We will have financial responsibilities without significant revenue to offset these costs. With assessments already afoot for police and fire protection inside our current boundaries, what would that mean for the future? Most citizens are against assessments for such services, especially when they may not favor annexation in the first place.

O - 5

c) The DEIR mitigation measures to resolve water issues are inadequate. Any residential development will surely jeopardize the fast-receding aquifer in this Valley. Any governing agency will be faced with its depletion and must proceed with extreme caution.

O - 6

d) The impact of two airports has not been sufficiently addressed in the DEIR: noise, traffic, safety, and economic impact. No noise study was conducted on projected expansion runways and larger aircraft. If the Regional Airport is going to be developed, and owned by La Quinta, what are the costs to develop new runways, terminals, etc.? Even if not owned/managed by La Quinta, the problems of safety and additional noise will impact those who live in the area. Are these the problems we need within the boundaries of La Quinta?

O - 7

e) The cultural element of the DEIR seems only to address the 372 Native American archeological sites, but does not mention our recent cultural history of agriculture, equestrian, and art. Where is the preservation of date and citrus groves? Of equestrian trails and ranches? Where is the support for the arts? The City has let a prime location for a citrus orchard/date grove/park to slip by (Eisenhower and Tampico): what a lovely reminder of our past that would have been! The City should have purchased this, and should purchase the wash along Montezuma/Bike Path and preserve it for the future. Equestrian trail with parks would be charming, and a wonderful place for families to experience our cultural past (just ask Frank Bogert about horseback riding in La Quinta!). As for the Native American sites, where are the trails and parks for people to enjoy the petroglyphs, fish traps, and sites where they lived? Instead of sealing them up, let's work with the local tribes to develop awareness of their culture. These need to be accessible on site, not just in the Historical Museum.

O - 8

I believe that the mitigation factors outlined in the DEIR do not resolve the numerous negative impacts to the degree that we should expect for our City. We should defer

O - 9

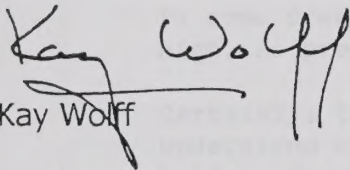
approval of this plan and reject the DEIR until we can find a balance among size, environmental impact, and amenities due to our current residents. We cannot be enticed into thinking that bigger is better, because it usually isn't.

O - 9

Lastly, I chide the City Council for not making a greater effort to involve the citizens in the General Plan process. I know that the letter of the law has met for publication of notices, but this is the bare minimum. Where were the ad campaign posters advertising the fact that the future of our city will be outlined in an important document, and soliciting input? Where were the notices in the "Gem" asking if we want to be a city of 208,000? Do we want an airport, a cemetery, sections of Hwy 86 and railroads, etc.? Where was the public sampling by phone or mail-in questionnaires? Decision-makers must listen to the public, not just the real estate agents and developers. Enough money was spent on the study and documents, but what was spent on the process to really assess the will of La Quinta residents? Do you really want to know what the public thinks, or is the City Council the sole arbiter of La Quinta's "vision"?

Once passed, California Government Code Section 65103(c) requires that we implement the General Plan. Is this the Plan we want to implement? NOT ME!

Sincerely,

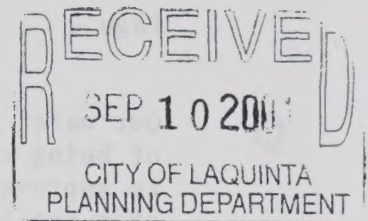


Kay Wolff

Cc: City Council Members and Commissioners
Other interested parties

82550 Ave 60
Thermal. CA. 92274

September 10, 2001



City of La Quinta
78495 Calle Tampico
La Quinta. CA. 92253

P

SUBJECT: ANNEXATION

Dear Sir/Madam:

I OPPOSE being annexed to your city, I wish to stay agricultural property, and do not want to be rezoned four houses per acre.

Upon reading the enviromental report on page M-7 under Water Resources, irrigation water from homes does not percolate to the aquifer. This statement is untrue as our Thermal area is a non homogeneous strata, it is made up of many hundreds of feet of very fine sandy clay barrier, that makes that statement impossible. If that statement was a true fact then it would be easy to find a location for artificial recharge in our area. In some areas of proposed annexation, surface water is very high, as proof the barrier is very efficient.

P - 1

Certainly, the author of the report is misinformed and does not understand even the basic principle of water recharge. I cannot believe that the City paid for such a report. How many other errors does it contain?

P - 2

We live in a DESERT and presently, we have had less rain or snow to naturally recharge our aquifer recovery, and at present we are lowering our water table yearly by alarming amounts, and in the City of La Quinta it is dropping drastically, and the City is not developing fully, how will it be when fully developed?

P - 3

It is alarming to me to see the waste of good pristine ground water to irrigate illogical strips of grass along manicured avenues, and are especially designed at 45° angle or less so it runs off into the gutter, and as a solvent to destroy the streets.

P - 4

The City just approved this type of landscaping at Ave 56/Monroe and Ave 58/Madison. This is a crime and should not be permitted just because it looks good to the occasional walker, bicyclist and passerby at 55 MPH.

Please do not annex my property as I DO NOT want to be associated with this kind of waste. How could learned men design, build and develop and approve such wasteful things.

P - 5

Our water is ancient, it's being removed faster than it's capable of being recharged by man or nature. Seems to me if anything is approved we will continue groundwater mining at a higher rate than the present, as according to the proposed map most of this is developed farm land, using canal water for irrigation, and the water level continues to drop, what will happen when four houses per acre is approved?

P - 6

We will be continuing groundwater mining instead of groundwater pumping. I know these from personal experience as a local Water Well and Pump Contractor.

Also what concerns me is new developments i.e. houses and golf courses install "dry wells" designed to carry run-off of flood water, or irresponsible irrigated landscape, the latter is what the dry wells receives most and with the waste water goes oil, fertilizer, antifreeze, rotten grass cuttings from the neighborhood streets.

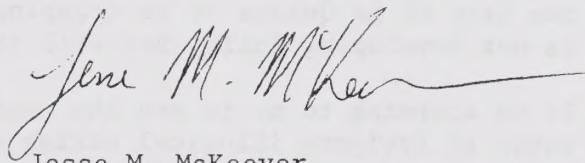
P - 7

I was appalled when asked to clean out some of these "dry wells" as it was polluted and would not absorb anymore run-off. When a water well is drilled it is required to have the top 200' cemented off to prevent pollutants from entering the aquifer and the City requires that on developments to directly introduce the pollutants into the ground, not a good idea,

Please use common sense and take a good look at what lies beneath us and is very little understood by the majority of the people including the ones who make major decisions.
KEEP THE CITY THE SIZE IT IS UNTIL ALL IS UNDERSTOOD.

P - 8

Concerned Landowner



Jesse M. McKeever

JMM:apm

cc: Supervisor Roy Wilson
Transportation & Land Management agency
Vista Santa Rosa - Betty M. Smith



RICHARD M. FOXX
78365 Highway 111 #338
La Quinta, CA 92253

Q

August 5, 2001

City of La Quinta
78-495 Calle Tampico
La Quinta, California 92253

Dear Sir or Madam:

I am writing in opposition to the acceptance of the Draft Environmental Impact Report (SCH NO.: 2000091023).

Q - 1

This report points up the massive impact on the area in question. The residents of the City of La Quinta deserve to be fully informed about the wholesale desecration of this unique area. Such information should be disseminated by a series of well-publicized public information sessions with presentations by the appropriate agencies as well as by the planning and research people. This is done in other cities all over California with far less to lose.

Q - 2

Until and unless this is done, expediting the acceptance of this report through council constitutes nothing less than the most blatant manifestation of behind-closed-doors government.

Sincerely,

Richard M. Foxx



R

August 25, 2001

Mr. Fred Baker
Principal Planner
City of La Quinta
78-495 Calle Tampico
La Quinta, CA 92253

**Review of Comprehensive General Plan
Draft Environmental Impact Report
SCH NO. 2000091023**

Dear Mr. Baker:

After a review of the above Comprehensive General Plan document, the Coachella Valley Archaeological Society is in agreement with the findings, mitigations and recommendations as presented in the Cultural Resources Element of the Draft Environmental Impact Report.

R - 1

It was noticed in the Management Summary portion of the Paleontologic Resources Mitigation Plan the informally designated "Lake Cahuilla beds" are shown to contain fossils of Pleistocene through early Holocene age throughout their extent. Yet, based on archaeological dating, many of the shoreline campsites found in the La Quinta area were occupied up until about 300 years ago. This should make the lake bed sediments present in those areas very late Holocene in age, not Pleistocene through early Holocene.

R - 2

We thank you for the opportunity to respond to this report and support the City of La Quinta in their efforts to **preserve and educate** the residents of the Coachella Valley. Knowledge of our past is important to our future, and every effort should be made to gain as complete an understanding as possible.

Sincerely yours,

Katherine Williams

Katherine Williams, Chairperson
Environmental Assessment Committee

Cc: Nicole Sauviat Criste



REQUEST FOR SPECIAL NOTICE

S

I (We), the undersigned, request notice of all CEQA (California Environmental Quality Act) and other notices, and hearings, relating to the City of La Quinta's Comprehensive General Plan, Annexation No. 12 and Sphere of Influence Amendment, and all CEQA and other notices, and hearings, relating to any and all projects to annex, or modify the Sphere of Influence, to the south of Highway 111 and the east of the current city limits of La Quinta. (Public Resources Code Sec. 21092.2)

Signature: Ellen Lloyd Trover

Printed Name: ELLEN LLOYD TROVER

Address: P. O. Box 297
COACHELLA, CA 92236

COMMENTS TO CITY RE PROJECTS:

I believe it is premature to issue an EIR on "Annexation No. 12" & SOI when neither the Agricultural Overlay nor the Equestrian Overlay is drafted. Further comments forthcoming.

S - 1

REQUEST FOR SPECIAL NOTICE

T

Pursuant to your Notice of Availability, I (We), the undersigned, request notice of all CEQA (California Environmental Quality Act) and other notices, and hearings, relating to the City of La Quinta's Comprehensive General Plan, Annexation No. 12 and Sphere of Influence Amendment, and all CEQA and other notices, and hearings, relating to any and all projects to annex, or modify the Sphere of Influence, to the south of Highway 111 and the east of the current city limits of La Quinta. (Public Resources Code Sec. 21092.2)

Signature: Vic Braden

Printed Name: Vic BRADEN

Address: 82480 Ave. 54

Vista Santa Rosa, Ca. 92274



COMMENTS TO CITY RE PROJECTS:

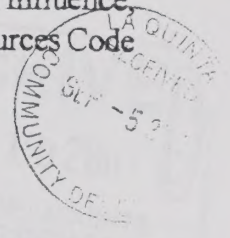
It would be wise to expand upon each issue on a website. This makes it possible for those involved in excess travel during August and September.

T - 1

REQUEST FOR SPECIAL NOTICE

U

Pursuant to your Notice of Availability, I (We), the undersigned, request notice of all CEQA (California Environmental Quality Act) and other notices, and hearings, relating to the City of La Quinta's Comprehensive General Plan, Annexation No. 12 and Sphere of Influence Amendment, and all CEQA and other notices, and hearings, relating to any and all projects to annex, or modify the Sphere of Influence, to the south of Highway 111 and the east of the current city limits of La Quinta. (Public Resources Code Sec. 21092.2)



Signature: Cathy Linford Kathy Linford

Printed Name: CORRY + KATHY LINEFORD

Address: 84485 AVE 61
THERMAL, CA 92274

VISTA SANTA ROSA
HOMEOWNER AWAY
FROM HOME

COMMENTS TO CITY RE PROJECTS:

Finish one project before you begin another. There are a lot of uncompleted projects I see as I drive thru La Quinta. We fear for the Valley + it's overpopulation. We've witnessed the rising humidity in the 20 yrs. We've been in the area. "Sprinkling" is a contributor, no doubt. All of the new residents want to live on a Fairway. You truly have "paved paradise and put in a parking lot."

U -



SUN COUNTRY RANCH

Norman and Gayle Cady

82-831 Avenue 54 - Vista Santa Rosa
Thermal, California 92274

V

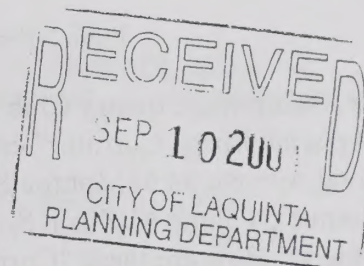
September 9, 2001

La Quinta Community Development Department

Attn: Fred Baker, Principal Planner

78-495 Calle Tampico

La Quinta Ca 92253



Re: City of La Quinta Comprehensive General Plan Draft
Environmental Impact Report, Draft Comprehensive General Plan
and Draft Master Environmental Assessment dated July 2001

Dear Mr. Baker,

My husband and I have spent considerable time reviewing and assessing the above referenced documentation. As individuals, registered voters, proud residents of Vista Santa Rosa, community involved citizens, parents, grandparents, equestrians, date farmers, ten acre ranch owners with eight horses, four head of cattle, three dogs, thirty chickens, and sixty or so quail, we have major concerns regarding certain text.

Our first item of concern is La Quinta's "multi-purpose non-motorized" equestrian trail system.

DRAFT COMPREHENSIVE GENERAL PLAN:

Reflects Madison, Monroe, and Jackson Streets North to South per Map Exhibit #3.10 Multi-purpose Trails.

Avenue 51 to Avenue 58 along Madison Street.

Avenue 52 to Avenue 66 along Monroe Street.

Avenue 50 to Avenue 66 along Jackson Street.

Reflects Avenue 58 (only) West to East per Map Exhibit #3.10 Multi-purpose Trails.

(Lake Cahuilla to Harrison Street - Then a "blank" area to Polk Street- Ending at I-10 Fwy)

Mr. Baker, why is there only one west to east non-motorized multi-purpose trail drawn? Why are there no other connector trails hooking up with the three north to south routes? Wouldn't it be more prudent and advantageous to have trails connect and intermingle with each other?

Mr. Baker, has the Country Club of the Desert been advised to construct “multi-purpose non-motorized” trails along their properties, including Avenue 52 south to Avenue 54 along Madison Street, and Avenue 52 south to Avenue 54 along Monroe Street? Are these “multi-purpose non-motorized” trails contained in their general plan? How will these trails be funded? By whom?

Agrarian Image Corridor - Map Exhibit #3.6 in Draft Comprehensive General Plan
Map Exhibit #2.5 in Draft Master Environmental Assessment

From Jefferson Street along Avenue 54 to Van Buren (West to East).

Mr. Baker, has Country Club of the Desert been advised by the City of La Quinta to include “Agrarian Image Corridor” enhancements, “equestrian facilities, etc.” from Jefferson Street east along Avenue 54 to Monroe Street? What about along their boundary from Avenue 52 south to Avenue 54 along Madison Street? Is it written anywhere in their general plan to include such a project? How are these “Corridors” to be funded and maintained? By whom?

It is difficult to ascertain whether the Avenue 54 Agrarian Image Corridor (from Jefferson Street east to Monroe Street) is to be located on the north or south side of the street. Should this Corridor be scheduled for the south side, have the current property owners, KSL/PGA West, and Merv Griffin, been notified? Are they expected to absorb the cost of construction?

From Madison Street along Avenue 58 to Filmore (West to East).

From Madison Street along Avenue 62 to Hwy 111 (West to East).

From Madison Street along Avenue 66 to Hwy 111 (West to East).

From Avenue 50 along Madison Street to Avenue 66 (North to South).

From Avenue 52 along Jackson Street to Avenue 66 (North to South).

From Avenue 56 (Airport Road) along Harrison Street to Avenue 66 (North to South)

Mr. Baker, there are at least eight trails reflected in the “Agrarian Image Corridor” - Map Exhibit #2.5 and #3.6 that have loose ends. They just stop. No connector trail listed. Trail design is inconsistent, disjointed, and UNCONNECTED. Remarkably similar to the La Quinta sidewalk system.

Page 30: “Pedestrian and other non-motorized circulation is encouraged in the City wherever possible. The provision for sidewalks, bike lanes, and multi-purpose trails is especially important along major roadways in the community. While “sidewalks” have been constructed in various parts of the City, their design and construction has been inconsistent, disjointed, and UNCONNECTED. In future development, pedestrian safety and accommodation should be given emphasis equal to that currently given to automobile access”.

Mr. Baker:

It should be noted here: **Riding a horse or a bicycle along major roadways is always dangerous and never safe.** Multi-purpose non-motorized trails should be located along less traveled roads for the benefit and safety of the rider, our children and our animals.

Page 39: "Policy 7 - Develop and encourage the use of continuous and convenient bicycle routes and multi-purpose trails to places of employment, recreation, shopping, schools, and other high activity areas with potential for increased bicycle, equestrian, golf cart and other non-vehicular use."

Mr. Baker, this being said, where in text or on any map or page are these "potential" equestrian, and multi-purpose non-motorized trailways clearly illustrated?

MASTER ENVIRONMENTAL ASSESSMENT DRAFT:

Page 46: "Riverside County Regional Parks and Open Space District 4.1.1: The County of Riverside (not La Quinta) has designated a number of regional and community trails. Regional and community trails are designed for equestrian activity, walking and mountain bike riding."

"Recreational Services and Facilities 4.1: The Bureau of Land Management (not La Quinta) maintains a system of hiking and equestrian trails in the southeastern region of the planning area."

Page 47: "City Trail System: The City has planned and dedicated a comprehensive system of multi-use trails extending throughout much of the City. Trail facilities are categorized by I, II, or III classifications. Class I trails are completely separated from any street or highway and are dedicated exclusively for shared bicycle and pedestrian use. Class II bikeways are on-road bicycle lanes within the paved section of the street. Class III trails are bike routes that are located on the street within vehicular traffic lanes."

Page 35: "Golf Cart Route System 2.6.3: As with on-street bike paths, cart path safety is of utmost importance."

Page 32: "Agrarian Image Corridors 2.4.4: Those streets which occur in areas of low density development, and which reflect the agrarian past of the region have been designated Agrarian Image Corridors. These streets will feature equestrian facilities, low canopy and citrus trees, and street furniture which reflect a rural character. The intersections of Agrarian Image Corridors should be highlighted by citrus trees. Agrarian Image Corridors include:"

" Avenues 54, 58, 62, and 66" (West to East)
" Madison, Jackson, and Harrison Streets" (North to South)

"Agrarian Image Corridors: Map Exhibit #2.5 in Draft Master Environmental Assessment
Map Exhibit #3.6 in Draft Comprehensive General Plan

Mr. Baker, once again there are at least eight trails reflected with loose ends. They just stop. No connector listed. Trail design is inconsistent, disjointed, and UNCONNECTED. Quite similar to the sidewalk system in La Quinta.

Open Space Element Goal, Policies, and Programs (Draft Comprehensive General Plan-Page 43)

Policy 6: " Develop a comprehensive multi-purpose trail network to link open space."

In summation, please review and reflect on the following “multi-purpose non-motorized trail system” and “Agrarian Image Corridors” comparison:

LQ Comprehensive GP Dft
Multi-Purpose Trails July 2001
Map Exhibit #3.10

Avenue 58 (East to West from
Lake Cahuilla to Harrison St.)

Madison, Monroe and
Jackson Street
(North to South)

LQ Master Environmental Assessment
July 2001 - Page 32
Agrarian Image Corridors

Avenues 54, 58, 62, and 66
(East to West)

Madison, Jackson, and
Harrison Street
(North to South)

Ryan Snyder, Consultant
working w/CVAG on Regional
Trails for Riverside County

Avenues 50, 56, 58, 60, and 66
(East to West)

North to South Streets
were not discussed.

Mr. Baker, the above comparison clearly illustrates major inconsistencies within La Quinta’s proposed “multi-purpose non-motorized trail system”, the “Agrarian Image Corridors” presentation, and the Riverside County Regional Trails Plan.

Further, placement of multi-purpose non-motorized trails along heavily traveled streets demonstrates insufficient research and knowledge regarding the unpredictability of people riding, whether it be on a bicycle or a horse. As an example, riding a bike or a horse along Monroe Street with eighteen-wheelers, motor homes, buses, cars and trucks whizzing by at sixty plus miles an hour does not even begin to constitute a leisurely relaxing ride in the country. It most assuredly sounds more frightening and dangerous than fun and enjoyable. Think about it. Would you honestly want your child out there riding under such conditions?

I have personally provided the City of La Quinta with photographs and pamphlets depicting successful rural and agricultural communities within Southern California. Included are newer beautiful pricey homes with their owners harmoniously living amongst country clubs, golfers, hikers, joggers, bicyclists, tennis folk, and equestrians. Beautiful meandering trails and golf courses can be seen throughout the area. None of this is even addressed in the Comprehensive General Plan Draft Environmental Impact Report.

Surely there are less traveled roads, or perhaps existing roads that can be adjusted to accommodate less traffic, or at least slow traffic down. One street comes to mind, Oasis Street, which runs (unpaved) from Avenue 53 south. There may be additional avenues as well. Perhaps collectively we could further explore such possibilities.

I would also like to see the Coachella Valley Water District open their canal roads for public trail use. I have written to Corky Larson, and have asked for her support as a very well known and respected community leader and CVWD board member. Corky agrees canal roads would provide a wonderful trail system, and has forwarded her endorsement of my suggestion to Tom Levy for review.

I have tried to contact several officers within KSL regarding the re-opening of the trail west of PGA and west of the canal from Avenue 54 to Lake Cahuilla. Except for a few places, there is ample room to hike or ride there along the base of the Santa Rosa Mountains. I am in touch with Rachelle at the Bureau of Land Management. We plan to walk the "trail" and do a feasibility study on creating a route to bypass PGA's 17th green which is physically located in the side of the mountain (cutting off the existing trail). BLM has assured me there are folks who actually build trails where to us it would be impossible.

Sadly, "equestrian" and other "riding" provision, welfare, safety and accommodation are rarely discussed in La Quinta's Comprehensive General Plan/Draft Environmental Impact Report, Master Environmental Assessment Draft or Comprehensive General Plan Draft. Indeed, it is painfully apparent minimal thought and scant appreciation have realistically been given in welcoming an equestrian neighbor who, on the average generates over \$200 million annually in to the East Valley's economy.

Mr. Baker, we have major concerns relating to La Quinta's proposed zoning ordinances, rules and illusory "agricultural overlay".

Re: Riverside County Right to Farm Ordinance - Ordinance #625
(Pursuant to Civil Code 1102.6)

"It is the policy of the State of California and the County of Riverside that no agricultural activity, operation, or facility, or appurtenances thereof, conducted or maintained for commercial purposes, and in a lawful manner consistent with proper and accepted customs and standards, as established by similar agricultural operations in the same locality, shall be or become a nuisance, private or public, due to any changed condition in or about the locality, after it has been in operation for more than three years if it was not a nuisance at the time it began. The phrase 'agricultural activity, operation, or facility, or appurtenance thereof' includes, but is not limited to the cultivation and tillage of soil, production, cultivation, growing, and harvesting of any agricultural commodity, including timber, viticulture, apiculture, horticulture, the raising of livestock, fur bearing animals, fish or poultry, and any practices performed by a farmer or on a farm as incident to or in conjunction with such farming operations, including preparation for market, delivery to storage or to market, or to carriers for transportation to market."

"AGRICULTURAL OPERATIONS which typically occur during the day, but which may occur at night include the use of heavy machinery which may GENERATE NOISE and dust. Applications of agricultural chemicals that are applied within state and local permit requirements may have noticeable odors associated with their application. Organic fertilizers may be employed that generate their own objectionable odors. When and if frost and/or freezing conditions occur, helicopters may be employed at low altitudes to stir up the air and prevent freezing. Workers traveling to and from agricultural property to engage in work may generate additional traffic and noise on public streets in the vicinity."

Existing agricultural land uses in the La Quinta General Plan area are currently under the jurisdiction of Riverside County. The Riverside County General Plan designates them for "**Agricultural (AG)**" **development**, a designation which permits agricultural cultivation, associated uses (including limited commercial, industrial, and **single-family residential development at a MAXIMUM DENSITY of ONE DWELLING UNIT per TEN ACRES.**

Mr. Baker, La Quinta is adamantly proposing low density zoning - four houses per acre (versus our current one house per 10 acres zoning designation with Riverside County.)

“ Page 6-Proposed Land Use Designations-Table 1.1: Very Low Density Residential, VLDR (Up to 2 dwelling units per acre). This designation provides a transition between agricultural lands and residential uses. It encourages large lot subdivisions and equestrian use.”

As a compromise suggestion from our County one-dwelling-on-ten-acres zoning ordinance to La Quinta's proposal of significantly more homes on considerably less acreage, we much prefer inclusion of a one residential dwelling maximum per five acre parcel agricultural/equestrian zoning ordinance. Our second choice would be, without compromise, a maximum of one residential dwelling per two-and-one-half acre parcel agricultural/equestrian zoning ordinance.

The “Agricultural Overlay” provides for the continuation of existing agricultural activity at the discretion of the land owner (Page III-24 EIR).

Agricultural uses within this overlay area shall be permitted to continue as they occur at the time the Recommended General Plan is adopted (Page III-28 EIR).

Buildout of the proposed General Plan will result in the construction of approximately 68,811 new residences (Page 79-Draft Comprehensive General Plan).

Letter dated 10-04-2000 from County of Riverside Transportation and Land Management Agency, Planning Department - Aleta J. Laurence, AICP:

“After reviewing the proposed General Plan Update the County offers the following comments:

- (1) The most significant change in the recommended alternative land use plan are changes to the agricultural land use designation which was eliminated (Page 12). Lands under the County's jurisdiction outside of the planning area are primarily agricultural and open space in nature. We would recommend consultation with the County on these proposed land use designations and that proposed land use designations in the City's general plan update be **compatible with adjacent County land use designations and agricultural preserves**.
- (2) The City of La Quinta and the Coachella Valley are located within one of the most biologically unique and diverse regions in the country. Buildout of the incorporated City, its sphere of influence, and other planning area lands outside of the sphere of influence, pursuant to the Recommended Land Use Plan, has the **potential to cause significant environmental impacts**. We recommend that the zoning designation in the proposed City's General Plan be consistent with the Coachella Valley Multi-Species Habitat Conservation Plan (MSHCP).
- (3).....Many residents and landowners from this area attended a community meeting October 4, 2000 and expressed strong desire to keep their area rural and equestrian friendly, both to protect their rural lifestyles as well as to support the large equestrian oriented tourism industry in the area.

THE CITY'S GENERAL PLAN SHOULD ADDRESS THIS NEIGHBORING RURAL EQUESTRIAN LIFESTYLE, EQUESTRIAN TRAIL LINKAGES BETWEEN THE COUNTY AND THE CITY, AND EFFECTIVE METHODS OF BUFFERING THE RURAL USES FROM ADJACENT, MORE URBAN USES IN THE CITY.”

Mr. Baker, Mayor John Pena repeatedly states he and the City of La Quinta have “no plans to, no desire to, and no intention of changing anyone’s lifestyle in the Community of Vista Santa Rosa” through annexation. Can this be true?

Page III-28, Section 3-G-EIR : ALL AGRICULTURAL and urban ACTIVITIES SHALL CONFORM TO THE NOISE STANDARDS described in Section 9.100.210 of the City Municipal Code and other mitigation measures set forth in Section III-J (Noise) of this EIR.

Page III-144, 1-Existing Conditions: Evaluation of noise levels within a community is important to protecting the health and welfare of the general public, and can help define the need for remedial measures for existing noise problems and those associated with future development.

Page III-144, 1-Noise Rating System: A number of noise rating scales are used in California to evaluate land use compatibility. The equivalent sound, or Leq scale, represents average constant noise level over a given period time, and is the basis for the Ldn and CNEL scales. Ldn value represents a summation of hourly Leq’s over a period of 24 hours, and includes a weighting factor or penalty for noise occurring in the nighttime period of 10:00 p.m. and 7:00 a.m. The Community Noise Equivalent Level (CNEL) represents a 24-hour average noise level which includes a 5dBA penalty for noise occurring during evening time period (from 7 p.m. to 10 p.m.) and a 10dBA penalty for noise occurring during nighttime period (from 10 p.m. to 7 a.m.)

V – 1

Appendix E-EIR Noise Element Update Technical Report -Pg 3: NOISE, as it has been simply defined is “UNWANTED SOUND.” It is an undesirable by-product of transportation systems and industrial activities within a community that permeate man’s environment and cause disturbance. The full effect of such noise on individuals and the community will vary with its duration, its intensity, AND THE TOLERANCE LEVEL OF THE EXPOSED INDIVIDUALS.

Mr. Baker, it is quite apparent La Quinta is making diminutive effort to accommodate and encourage the current rural, agricultural, and equestrian lifestyle and daily routine of Vista Santa Rosa residents. Expecting this community to arbitrarily accept your token inadequacy offering of an “Agricultural Overlay” versus qualified perpetuity agricultural and equestrian zoning ordinances is absurd. Demanding all undeveloped open space property immediately conform to “four houses per acre” zoning designation upon annexation is ludicrous.

Several months ago I personally presented the City of La Quinta with copies of several rural and agricultural zoning ordinance schedules currently being utilized by Riverside County. These ordinances were obtained from the County Planning Department, and are readily available to anyone with initiative to inquire.

Sample of County Zoning Ordinances Submitted:

R-A ZONE (Residential Agricultural) - Country Estate Lifestyle
A-1 ZONE (Light Agriculture)
A-2 ZONE (Heavy Agriculture)
A-D ZONE (Agriculture-Dairy)
A-P ZONE (Light Agriculture with Poultry)
N-A ZONE (Natural Assets)

We firmly believe insertion of these or similar agricultural/rural zoning ordinances in to the La Quinta General Plan may enhance the likelihood of La Quinta having a more favorable response to proposed annexation. **Clearly, without cooperative zoning ordinance stipulation, a negative vote for annexation would be appropriate.**

Mr. Baker, it is totally incomprehensible to us as to how, in all good conscience, the Coachella Valley Water District Management and the City of La Quinta elected officials can mutually agree on and approve new construction proposals of over sixty thousand homes within the Vista Santa Rosa Community while exhibiting flagrant disregard for the subsistence and preservation of our precious water supply.

Re: DMEA- Pg 103 6.3.6 Seismically Induced Geologic Hazards-Liquefaction:

“MUCH OF THE EASTERN PORTION OF THE PLANNING AREA CONTAINS GROUND WATER WITHIN 30 FEET OF THE GROUND SURFACE AND IS SUSCEPTIBLE TO LIQUEFACTION. LIQUEFACTION IS LARGELY LIMITED TO LANDS CONTAINING SHALLOW GROUND WATER (WITHIN 50 FEET OF THE GROUND SURFACE) AND SANDY, SILTY SOILS.

**HAZARDS ASSOCIATED WITH LIQUEFACTION
CAN BE MINIMIZED BY RESTRICTING OR PROHIBITING
CONSTRUCTION WITHIN SUSCEPTIBLE AREAS.”**

_s

Re: CVWD Letter 10-06-2000 from Tom Levy, GM/Chief Engineer to LO

..... “THE GROUNDWATER AQUIFER IS IN A STATE OF OVERDRAFT.”

.....”LAND SUBSIDENCE DUE TO THE OVERDRAFT OF THE GROUNDWATER BASIN
MAY AFFECT THE STRUCTURAL INTEGRITY OF FOUNDATIONS AND STRUCTURES.”

**Re: DESERT SUN NEWSPAPER 5-13-2001 “SPECIAL REPORT: SHRINKING WATER
RESERVES - WATER CONSUMPTION OUTPACES ABILITY TO REPLENISH SOURCE”**

**Tom Levy, CVWD General Manager and California Water Contractors
Association President, sighs ruefully when asked about long-range planning:**

**“We water guys can never confront the hard issues. We find a temporary
fix and hope we’re retired before we have to answer for it. Then if the
kids are attorneys, they can make a living sorting it out.”**

Mort Rosenblum, AP Special Correspondent, “The desert around here (Palm Springs area) is so dry that imported Arizona cactus needs watering. A quarter million residents use an average of 375 gallons of water a day at home, twice the national average.

To water specialists, the over tapped Colorado River basin is symbolic of a calamity facing much of the world. Fresh water reserves are disappearing fast. The planet has no more fresh water than it did millennia ago, but with today’s rocketing growth in arid zones, conflicting needs of farms, cities, industry, recreation and wetlands promise bitter water wars.

**Water managers across America say the public and political leaders who can effect
change seem to ignore the danger.** ‘Planners always say that we can worry about water supplies in the future,’ said Tom Turney, New Mexico state engineer.

Dennis Underwood, former head of U.S. Bureau of Land Reclamation, and now assistant director of the Met in Los Angeles, lamented, 'When it comes to planning, we're still looking at the end of our noses.'

Linda Vida, Water Resources Center at University of California-Berkeley, 'Nobody is looking out. The stakeholders want what they want. No political leader is willing to go out on a limb and make some people very unhappy. No one wants to deal with tying growth to resources. They just squeeze out more. As a result, a drought that otherwise might be managed with water reserves could hit California far harder than the energy crisis'."

Re: CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD- Letter 10-05-2000

- 1) "The proposed project has a potential for runoff and flooding which would create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage system controls.
- 2) The proposed project **may substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there will be a NET DEFICIT IN AQUIFER VOLUME -or- LOWERING OF GROUNDWATER TABLE.**
- 3) The proposed project may substantially alter the existing drainage pattern of the site or area, including alteration of the course of a stream or river, in a manner which will result in a substantial erosion or siltation on or offsite.
- 4) The proposed project will substantially alter the existing drainage pattern of the site or area including the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in such a manner which would result in flooding on or offsite."

Re: COACHELLA VALLEY WATER DISTRICT LETTER - May 16, 2001

"The proposed annexation area totals 5,419.9 acres bounded on the north by Airport Boulevard, on the east by Jackson Street, on the south by Avenue 62, and on the west by the existing city limits.

The sphere of influence amendment consists of 8,205.4 acres bounded on the north by Avenue 50, on the west by Jackson Street, on the south by Avenue 62, and on the east by Polk, Harrison, and Van Buren Streets.

The annexation area and sphere of influence amendment areas are primarily vacant desert lands and large residential development. The city's proposed zoning designations for these areas consist of mostly low density residential with a small amount of medium to high density and mixed commercial zoning.

**'THE COACHELLA VALLEY GROUNDWATER BASIN
IS IN A STATE OF OVERDRAFT'**

Future development within the General Plan area, including the annexation and amended sphere of influence, **WILL CONTRIBUTE IMMENSELY TO THE VALLEY WIDE OVERDRAFT.**

Groundwater recharge goals stated in the Coachella Valley Water District Urban Water Management Plan include continuing the current level of groundwater recharge in the upper valley and implementing a lower valley recharge program."

Mr. Baker, to date no comprehensive or definitive lower eastern valley water replenishment program has been officially implemented by the Coachella Valley Water District. In reality it would take several years to achieve and successfully execute such a plan.

Mr. Baker, IN THE MEANTIME, WHILE THE BUREAUCRATS ARE FALLACIOUSLY STAGGERING OVER WHAT TO DO, OH MY, WHAT TO DO, OUR EAST VALLEY UPPER THERMAL SUB-AREA WATER TABLE RESOURCE BASIN IS CONTINUING TO EXPERIENCE AN EVER INCREASING OVERDRAFT CONDITION!!!

Appendix G- Seismic, Geologic and Flooding Hazards EIR-Pg 1-2, 1-5, 1-28, 1-29:

"Liquefaction/Ground Failure: Portions of the La Quinta general plan are susceptible to liquefaction and landsliding or rockfall, both very destructive secondary effects of strong seismic shaking. Liquefaction occurs primarily in saturated, loose, fine to medium-grained soils in areas where the ground water table is 50 feet or less below the ground surface.

Liquefaction does not occur at random, but is restricted to certain geologic and hydrologic environments, primarily recently deposited sands and silts, in areas with high groundwater levels. Currently, shallow ground water, within 50 feet of the ground surface, is present ONLY in the eastern portion of the general plan area. Therefore, at present, this is the only area susceptible to liquefaction.

Four general approaches apply to mitigation of liquefaction hazards: 1) AVOIDANCE 2) Prevention, 3) Engineered Design, 4) Post-earthquake Repairs. A prime way to limit the damage due to liquefaction is to AVOID AREAS SUSCEPTIBLE TO LIQUEFACTION.

Appendix G - Ground Subsidence Pg 2-8, 2-9, 2-10: Ground subsidence is gradual settling or sinking of the ground surface with little or no horizontal movement. This phenomenon is usually associated with the EXTRACTION OF oil, gas or GROUNDWATER from below the ground surface with a resultant loss in volume. Ground fissures were observed in the City of La Quinta in 1948. Regional subsidence related to GROUNDWATER WITHDRAWAL is believed to have occurred in the Coachella Valley.

The
GROUNDWATER BASIN IN THE COACHELLA VALLEY IS CURRENTLY IN A STATE OF OVERDRAFT.

**GROUNDWATER LEVELS IN THE LA QUINTA AREA ARE DECLINING
AT AN INCREASING RATE AS A RESULT OF VALLEY WIDE
MINING FOR GROUNDWATER.**

**GROUNDWATER LEVELS IN 1996 WERE IN MANY AREAS
LOWER THAN THE HISTORICAL LOW GROUNDWATER LEVELS.**

**These observed declines in water level have the potential to induce new or renewed land
subsidence in the area affecting the City of La Quinta.**

The timing of subsidence measurements corresponds with water level declines. Land subsidence is probably occurring, and a significant part of the measured subsidence likely has occurred since 1991, about the time when water levels began declining below their previously recorded low levels. Land subsidence can result in the disruption of surface drainage, reduction of aquifer system storage, formation of earth fissures, and damage to wells, building, roads and utility infrastructure. Mitigation of subsidence requires a regional approach to groundwater conservation and recharge. Mitigation measures are expected to be difficult to implement.....

CONSERVATION EFFORTS WILL BE MORE THAN OFFSET BY THE RAPID GROWTH
OF THE REGION AND THE HEAVY WATER REQUIREMENTS OF GOLF COURSES.*

*(plus-or-minus 8 acre-feet per acre per year)

CURRENTLY, GROUNDWATER RECHARGE IN THE LA QUINTA AREA IS MINIMAL.

DMEA-Pg 57 CVWD: CVWD currently operates eleven active wells throughout the planning area. Two inactive wells are located within the PGA West development at the southwest corner of 54th Avenue and Madison Street. A new well is proposed at the southeast corner of Airport Boulevard and Madison Street. Most existing wells are drilled to depths of 700 to 800 feet.

CVWD's NEWEST WELLS ARE DRILLED TO DEPTHS BETWEEN 1,000 AND 1,300 FEET.

DMEA-Pg 93 Groundwater Resources: The water table in the Lower Thermal area had risen in the past several years, primarily due to the application of imported water from the Coachella Canal and reduction in pumpage, while the Upper Thermal sub-area's water table has fallen. It appears that increased urbanization may be causing the Lower Thermal sub-area to currently be in overdraft."

Mr. Baker, I have endeavored to highlight some of Norman's and my major grievances regarding La Quinta's Comprehensive General Plan Draft Environmental Impact Report, La Quinta's Draft Master Environmental Assessment, and La Quinta's Draft Comprehensive General Plan dated July 2001. Although of issue, I have omitted discussing some items such as traffic, air quality, adequate infrastructure provisions, electrical power, schools, park and recreational facilities, law enforcement, fire protection, etc. It is my understanding addressing any questionable items at a public hearing is entirely appropriate, so we have elected to do so as the need arises.

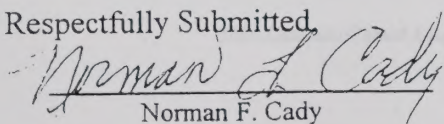
We are genuinely disappointed in La Quinta's seemingly inherent propensity to blatantly disregard specific necessities, wishes, desires and suggestions frequently voiced by her agricultural and equestrian neighbors. Sadly, provision for equestrian enjoyment, welfare, safety and accommodation are rarely mentioned in the text. Needs and concerns of the farmers were given negatory attention. It is quite apparent little thought or appreciation has been given to this esteemed group of people who project an incredibly awesome lifestyle and are making considerably valuable contributions to the people and the economy of this valley.

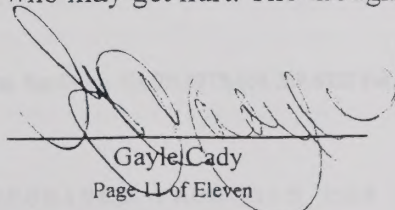
We are dismayed at La Quinta's obvious reluctance to accept and accommodate several of Vista Santa Rosa's current residents by incorporating new zoning ordinances to better service and enhance the existing agricultural, rural, and equestrian lifestyle.

As I mentioned early on, it is totally incomprehensible to us as to how, in all good conscience, the Coachella Valley Water District Management and the City of La Quinta elected officials can mutually agree on and approve new construction proposals of over sixty thousand homes within the Vista Santa Rosa Community, while exhibiting flagrant disregard for the subsistence and preservation of our precious water supply.

The availability of water necessary for life. The power of nature to destroy life through drought, flood, liquefaction, and subsidence. Meanwhile, the bureaucrats are scrambling over who thinks they can fix what first on the water issue, and the developers are selling their souls to make a buck regardless of consequences or who may get hurt. The thought process is very frightening.

Respectfully Submitted,


Norman F. Cady


Gayle Cady
Page 11 of Eleven

September 9, 2001
Date

Matthew P. Wiedlin, CHG.

Page 1 of 4

VIA FAX

September 10, 2001

W

Mr. Jerry Herman
Community Development Director
City of La Quinta, Community Development Department
78-495 Calle Tampico
La Quinta, CA 92253

Subject: Evaluation of Coachella Valley Water Resources

Dear Mr. Herman:

I have been retained by several property owners in the lower Coachella Valley to evaluate the impact of La Quinta's Draft Comprehensive General Plan on water resource management plans for the Coachella Valley. La Quinta's Draft Environmental Impact Report projects that build out of the preferred alternative will increase the groundwater overdraft. The long term ability of the area's water supply to meet the increased needs of projected development depends to a large extent on the successful implementation of efforts described in CVWD's draft water management plan. This letter has been prepared to provide you with an independent and objective view of Coachella Valley's water resources so that La Quinta's land use decisions and annexation plans may be made with a better understanding of the strengths and limitations of CVWD's plan.

W - 1

I am a consulting hydrogeologist, certified by the State of California, with a Masters of Science degree from San Diego State University in Geological Sciences. My course work specialized in hydrogeology and my graduate research focused on evaluation of methods of measuring groundwater recharge. I have 18 years of professional experience as a hydrogeologic consultant. I have attached a copy of my resume that describes my experience in more detail.

My opinions are based on the review of the following documents:

- Coachella Valley Draft Water Management Plan, Prepared by the Coachella Valley Water District, November 2000.
- Analog Model Study of the Ground-Water Basin of the Upper Coachella Valley, California, USGS Open File Report, Prepared by Stephen J. Tyley, January 28, 1971.
- Evaluation of a Ground-Water Flow and Transport Model of the Upper Coachella Valley, California, USGS Water-Resources Investigations Report 91-4142, Prepared by Eric G. Reichard and J. Kevin Meadows, 1992.
- Peer Review Report of Groundwater Model Prepared by Montgomery Watson for Coachella Valley Water District, Prepared for Redwine and Sherrill, Riverside, California, by S. Larson, J. Mercer, and I. Remson, September 18, 1998.
- City of La Quinta's Draft Environmental Impact Report, by Terra Nova Planning & Research, Inc., dated July 2001.

BACKGROUND INFORMATION ON THE COACHELLA VALLEY WATER RESOURCES

The CVWD manages the water resources of the Coachella Valley by integrating imported surface water from several potential sources with water conservation, and reclamation of wastewater and irrigation return water. Because of the very limited natural groundwater recharge that occurs in the desert, in the long term, groundwater in the Coachella Valley is not a viable additional source of water for the community. However, the permeable alluvial sediments in the valley provide a critical resource management tool to store imported surface and reclaimed water with minimal loss to evaporation. The high water storage capacity of the alluvial sediments in the Coachella Valley allow CVWD to accommodate the differences in timing between peak water demand and the availability of surface water. As noted in the CVWD Draft Water Management Plan, for many years the basin's high storage capacity has been used to essentially mine groundwater without consideration of the long term sustainability of the resource. Ultimately, the ability to sustain the types of future land uses described in the CVWD Draft Water Management Plan and the City of La Quinta Draft Environmental Impact Report is nearly entirely dependent on the success the CVWD has in acquiring imported surface water. Therefore, groundwater should be perceived not as a water source, but as resource tool to store imported and treated water.

According to the draft water management plan, groundwater in storage in the Coachella Valley has declined by 1.4 million acre feet from 1936 to 1999. For scale, this compares to a total water source under the preferred alternative of 632,000 acre-feet per year, including Colorado River Water, SWP water, Recycled Water, and Desalinated Agricultural Drain Water. The preferred alternative will reduce this deficit to about 1.0 million acre-feet by 2035. By 2035, the annual change in groundwater storage is + 6,800 acre-feet, 1% of the planned annual water sources for the basin.

COMMENTS REGARDING THE CVWD DRAFT WATER MANAGEMENT PLAN

The water management plan is a reasonably well written and organized document that conforms to California Department of Water Resources standards for water management plans. The plan reviews a number of water management alternatives and identifies one as a preferred alternative. Clearly, CVWD's preferred alternative is, in fact, the best management choice. However, because much of the document focuses on the evaluation of other alternatives, and because the water resource issues in the Coachella Valley are fairly complicated, there are areas where, in my opinion, the plan could be better focused. My observations regarding the draft water management plan pertain to the plan objectives, certainty of water sources, safety factors for water management, and contingency planning.

Plan Objectives

It appears that an unstated objective in the draft water management plan is that water shall not be a limiting constraint to the land and economic development forecasted for the area. This comment is based on: 1) the plans described in the preferred alternative, which demonstrates how the CVWD will develop water resources sufficient to meet forecasted water demands and; 2) the absence of any contingency plans by CVWD other than continued mining of groundwater if sufficient imported water sources cannot be contracted. In my opinion, it is unlikely that the CVWD can provide a meaningful warranty that forecasted water demands can be met considering the competition for

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provide a reserve supply to the community in the event of drought in the imported water source areas, spikes in water cost, and provide CVWD with a stronger negotiating position in water

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imported water and the need to stop mining groundwater to prevent water quality degradation and land subsidence.

An excellent objective identified in the plan is the elimination of decreasing groundwater storage and declining groundwater levels. However, the plan does not positively state that an increase in groundwater storage is an objective. An increase in groundwater storage is necessary to ensure that water levels do not fall below CVWD's water level criteria of 1949 historic low groundwater elevations. This criteria is established to minimize the potential for land subsidence associated with groundwater withdrawal. Though the plan identifies the lower valley as most susceptible to subsidence, subsidence monitoring data indicate that the upper valley has been subject to seven centimeters (about 3 inches) of subsidence in the past decade. Considering the potential damage to infrastructure, most planners consider any measurable amount of subsidence unacceptable. Additionally the plan later shows that based on groundwater model predictions for the preferred alternative, water levels in the upper valley are expected to fall below 1949 levels thus exposing this area to further risk of land subsidence.

Certainty of Water Sources

Contracting of imported water is a long term effort with no guarantees that the planned amount of imported water will actually be acquired on a reliable basis. The ability to obtain imported water in the future will become increasingly more difficult as California's allocation of Colorado River water decreases and water demand increases through our California and the Southwest. Though the plan clearly acknowledges that there is uncertainty in acquiring imported water, it makes no plans for what actions will be taken in the event that there is a shortfall in water sources.

Additionally, it is important to remember that CVWD's plans to artificially recharge the lower valley with surface water remain technically unproven. Though initial studies apparently show reason for optimism, artificial recharge of 40,000 to 60,000 acre-feet of water is a major public works project that could easily be delayed or reduced in scope for technical or economic reasons. Even if the proposed method of artificial recharge proves to be fully or partially technically infeasible, other methods such as injection well fields could eventually deliver surface water to the groundwater basin. However, a delay in the implementation of the recharge program can result in either depletion of groundwater storage or limitation in the availability of water that is available to users throughout the valley.

Water Management Safety Factor

Because there is no guarantee that CVWD can obtain contracts for all the imported water needed to meet forecasted water demands and because it will probably take years to assess just how much imported water can be reliably brought to the Coachella Valley, the preferred alternative could include a percentage of the estimated available water resources, perhaps 10 percent, to be allocated to groundwater storage. This water would result in an increase in groundwater levels, thereby reducing the potential for land subsidence and water quality degradation from the Salton Sea and from shallow poor quality water. Over time, this additional water placed in storage would also provide a reserve supply to the community in the event of drought in the imported water source areas, spikes in water cost, and provide CVWD with a stronger negotiating position in water

Matthew P. Wiedlin, C.H.G.

Page 4 of 4

contracting. Much like financial budgeting, good water budgeting avoids a "hand to mouth" mentality and includes a contingency for less than optimum supply and demand scenarios. This type of management may become even more important in the future as the amount of domestic consumption increases since it is more difficult to reduce the amount of domestic consumption than it is to reduce the amount of agriculture under irrigation. Of course, the cost of creating a water savings is that the community is deferring the immediate use of water under a planned scenario to protect itself in the future for unforeseen water shortages. This may result in the delay of and possible reduction in scope of future development projects.

Contingency Planning

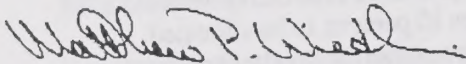
In addition to creating a water resource safety factor, water use and land development prioritization needs to be developed in the event of a shortfall. Prioritization could be developed within the plans for the preferred alternative, within the planning departments of the various local governments within the Coachella Valley, or as some form of joint effort. Shortfalls could be identified either by the discrepancy between water demand and water supply, or by groundwater elevation.

SUMMARY

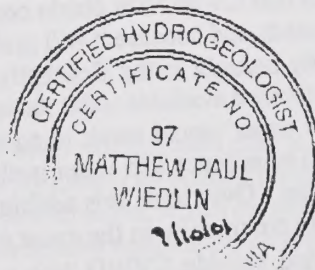
The La Quinta Draft Comprehensive General Plan needs to acknowledge and plan for the possibility that CVWD may not be able to provide all the water necessary to meet forecasted demands without continuing a program of groundwater mining. Competition for imported water will become increasingly more intense in the future and it is reasonably possible that CVWD will not always be able to obtain enough water as the forecasted demand. Consequently, it is appropriate that the water management plan allocate a portion of artificial recharge to increased groundwater storage to meet unforeseen water shortages without exposing the community to an increased potential for land subsidence and groundwater quality degradation. Additionally, CVWD and local governments, including La Quinta, need to develop a contingency plan for water shortfalls by prioritizing water uses.

Please contact me if you have questions regarding this matter.

Sincerely,



Matthew P. Wiedlin
California Registered Geologist, No. 5941
California Certified Hydrogeologist, No. 97



enclosure

cc (without enclosure): Robert Hargreaves, Best, Best & Krieger
Steve Robbins, Coachella Valley Water District

3684 Caminito Carmel Landing, San Diego, CA 92130 Ph 858 259-6732 Fax 858 259-6094

MATTHEW P. WIEDLIN, M.S.
CALIFORNIA CERTIFIED HYDROGEOLOGIST NO. 97

SUMMARY OF EXPERIENCE

Mr. Wiedlin is an independent consulting hydrogeologist. He has 18 years experience in water resources, geotechnical and environmental consulting. He has conducted ground water supply evaluations throughout San Diego County and in Orange County. Additionally, he has conducted ground water characterization and wellfield design studies across the country including California and Federal Superfund sites. He has also developed approaches to assess and remediate areas as large as 1.5 square miles that are impacted by high groundwater conditions. He has prepared groundwater flow and solute transport models. He has been an expert witness or consulting expert on several groundwater related lawsuits and has been responsible for the direction of ground water related litigation support projects. Areas of technical specialization include vadose zone hydrology and groundwater recharge evaluation

PROFESSIONAL REGISTRATION

- California Registered Geologist, Certificate No. 5941
- California Certified Hydrogeologist, Certificate No. 97

EDUCATION

- B.A., Geologic Sciences, University of California, Santa Barbara, California, 1981
- M.S., Geologic Sciences, San Diego State University, San Diego, California, 1986
- Borehole Geophysics For Groundwater Applications, A two day short course sponsored by the National Association of Groundwater Scientists; 1989
- 40-Hour seminar on Health and Safety Training for Hazardous Waste Sites, presented by Clayton Environmental Consultants, Inc.
- Dense Non-Aqueous Phase Fluids In Soil & Groundwater, A three day course sponsored by the National Association of Groundwater Scientists, 1987
- Volatile Organic Compounds In Soil, A three day symposium sponsored by the University of Wisconsin and the U.S. Environmental Protection Agency, 1993
- Applied Inverse Groundwater Modeling, A two day short course sponsored by the Geological Society of America, 1999.

MATTHEW P. WIEDLIN, M.S.
CALIFORNIA CERTIFIED HYDROGEOLOGIST NO. 97

PUBLICATIONS

- *An Evaluation Of Field Capacity As A Parameter For Groundwater Recharge Estimates*, Thesis presented to the faculty of San Diego State University in partial fulfillment of the requirements for the Degree, Master of Science in Geology. Spring 1986, M.P. Wiedlin.

PROFESSIONAL AFFILIATIONS

- Association of Groundwater Scientists and Engineers
- Groundwater Resources Association of California

PROFESSIONAL WORK HISTORY

April 1997-Present	Consulting Hydrogeologist
1994-April 1997	Hydrogeologist/Corporate Officer, Aqui-Ver, Inc., San Diego
1990-January 1994	Project Manager, Hargis + Associates, Inc., La Jolla, California
1985 to 1989	Staff Hydrogeologist, Hargis + Associates, Inc., La Jolla, California
1983 to 1985	Research Assistant in Groundwater Resources, County Planning Department, San Diego
1979 to 1981	Staff Geologist, Wahler Associates, Geotechnical Engineers, Palo Alto

MATTHEW P. WIEDLIN, M.S.
CALIFORNIA CERTIFIED HYDROGEOLOGIST NO. 97

REPRESENTATIVE PROFESSIONAL ASSIGNMENTS

- Sweetwater Authority-Implemented a groundwater exploration program of the San Diego Formation for an aquifer storage and recovery project. The exploration program included deep drilling, geophysical logging, well installation, and aquifer tests to evaluate the resource potential. Aquifer tests included packering of sections to evaluate the vertical distribution of groundwater production. Developed hydrogeologic work scope for production phase of the project.
- United States Navy-As a subconsultant to the Navy, developed and implemented a ground water and vadose zone study to evaluate the capacity of the aquifer and the adjacent riparian habitat to accept injected surface water. Conducted borehole geophysics and correlated lab, field and geophysical properties across the site. Conducted large scale pilot tests of infiltration basins and extended aquifer tests. Measured saturated and unsaturated hydraulic properties to evaluate the infiltration capacity of the study area and the associated rise in the water table. Developed a five-layer groundwater model to evaluate the impact of water injection on the water table and the associated change in nutrient concentrations.
- St. Vincent De Paul-Developed and am currently implemented a study to evaluate the sustainable yield of the groundwater resource within fractured rock underlying approximately 1,000 acres of land in East San Diego County as well as the regional groundwater resources of the Campo Creek alluvial aquifer. The study includes groundwater recharge evaluations based on chloride mass balance analysis and soil moisture retention methods, an aquifer storage evaluation supported by multiple aquifer tests and geophysical investigations, groundwater modeling to assess drawdown impacts on oak woodlands and riparian habitat.
- Agricultural Client- Evaluate the source of groundwater for a large agricultural complex in the area between the Santa Maria Valley and the San Pasqual Valley. Assess the hydraulic relationship between the two basins.
- City of Poway- Review and direct groundwater study for a golf course in Sycamore Canyon, a tributary to the San Dieguito River Basin. Evaluate sustainable yield, monitor pumping activity and groundwater elevations and assess hydraulic relationship to San Dieguito Canyon.
- Snowcrest Heights Improvement Association- Evaluated the water resources of the Upper San Antonio Canyon Watershed for the village adjacent to Mount Baldy in the San Gabriel Mountains. Provided recommendations on sustainable yield, exploration targets, and water storage.
- Carollo Engineering-Evaluated ground water resources for the City of Carlsbad in north San Diego County as part of their master plan for water supply, storm water, and sewage.

MATTHEW P. WIEDLIN, M.S.
CALIFORNIA CERTIFIED HYDROGEOLOGIST NO. 97

REPRESENTATIVE PROFESSIONAL ASSIGNMENTS (Continued)

- Hon Development Company- Evaluated ground water conditions including measurement of vertical hydraulic gradients across geologic units, aquifer testing, preliminary pumping well spacing based on aquifer test data, and preliminary groundwater recharge estimates. Developed a preliminary groundwater pumping plan to control groundwater heads for a landslide remediation project. Additional work is planned for 1999.
- Thorsnes Bartollota McGuire & Padilla-As a consulting expert provided independent groundwater evaluation for plaintiff and defendant in a groundwater related lawsuit. Performed aquifer testing, vadose zone monitoring and groundwater monitoring to evaluate a pilot groundwater extraction program and the direction and velocity of groundwater flow.
- Aerospace Company-Responsible for an extensive groundwater assessment program at a multiple-aquifer federal CERCLA site in Burbank, California. Assessment included borehole geophysical surveys, installation of approximately 30 monitor wells, approximately 40 aquifer tests, quarterly monitoring of over 100 monitor wells, water quality, water level, and well construction database management, and the preparation of approximately 12 different technical publications in support of the assessment.
- Chemical Manufacturing Company-Responsible for an extensive groundwater assessment program at a multiple-aquifer federal CERCLA site in Torrance, California. Assessment included, installation of approximately 25 monitor wells using several different construction techniques, borehole geophysical surveys, approximately 20 aquifer tests, quarterly monitoring of over 50 monitor wells. Data was used to design a containment well field.
- Aerospace Company- Defined hydrostratigraphy, conducted aquifer tests & prepared site assessment reports to support wellfield design for a multiple-aquifer site in order to contain a chlorinated hydrocarbon plume.
- Palomar Mountain Planning Organization-Advised organization on the proposed expanded production of groundwater including the veracity of groundwater recharge, groundwater storage, and groundwater drawdown estimates.
- San Diego County Planning and Land Use Department-Acted as primary researcher for a fractured rock groundwater resource and recharge study in eastern San Diego County. Work performed included creating study objectives and establishing field monitoring networks for groundwater levels, unsaturated hydraulic parameters, groundwater chemistry, stream discharge, and phreatophyte transpiration and precipitation.
- Sweetwater Authority-Identified potential locations for groundwater production wells for a water utility company. Well locations were based on the distribution of alluvial deposits and environmental restrictions.

MATTHEW P. WIEDLIN, M.S.
CALIFORNIA CERTIFIED HYDROGEOLOGIST NO. 97

REPRESENTATIVE PROFESSIONAL ASSIGNMENTS (Continued)

- Private Developer-Evaluated ground water recharge, storage capacity, well yield, and potential drawdown effects for a proposed 100-acre horse ranch in East San Diego County. Presented approach and findings at community meetings.
- San Diego County Environmental Health Dept.-Developed and directed a regional ground water study including development of an observation well field, aquifer testing, stream flow gauging.
- Thorsnes Bartollota McGuire & Padilla -As a consulting expert, evaluated high ground water conditions and identified relationship between shallow water table and regional aquifer. Provided groundwater extraction recommendations.
- Law Firm-As an expert witness, evaluated high ground water conditions in support of a geotechnical study/construction defect suit pertaining to moisture problems at a housing tract. Identified relationship between shallow water table and regional aquifer.
- Civil and Mechanical Engineering Firm- Developed approach to evaluate well yield for a medium sized municipality in east San Diego County.
- Nolte & Associates-Developed and implemented a program to measure the extent of brackish groundwater associated with a cheese manufacturing facility in the San Joaquin Valley in California. Using surface electromagnetic instrumentation, the survey identified the extent of impact and identified releases from several dairy farms in the area.
- Noranda Minerals-Evaluated the hydrogeologic conditions for a proposed tailing dam site in Idaho. Work performed included collecting rock core samples for fracture analysis, implementing packer aquifer tests, and geologic mapping.
- Major Oil Company-Performed vapor transmissivity test (i.e. air phase aquifer test) to evaluate feasibility of soil vapor extraction program in Riverside County, California. Managed Soil Vapor Extraction modeling effort to estimate extent and time of cleanup.
- Major Oil Company-At a Los Angeles Area refinery used multi-phase groundwater and oil modeling to demonstrate the unfeasibility of recovering free-product in one area of the site. Characterized the vertical ground water gradient and identified resultant errors in previous ground water flow direction and gradient calculations performed by others. Modeling and gradient work was supported by an electromagnetic borehole survey and hydraulic parameter measurement program to evaluate hydrogeologic conditions at an oil refinery near Los Angeles, California.

MATTHEW P. WIEDLIN, M.S.
CALIFORNIA CERTIFIED HYDROGEOLOGIST NO. 97

REPRESENTATIVE PROFESSIONAL ASSIGNMENTS (Continued)

- National Environmental Engineering Firm-Using steady state numerical calculations, evaluated hydrocarbon saturation, mobility, and potential recovery by fluid pumping at a military base in San Diego County. Calculations were based both on lab and field measured parameters. Specific hydrocarbon volume (volume per unit area) as a function of product thickness, soil capillary properties, and fluid properties were calculated. Vertical hydrocarbon saturation profiles corresponding to static fluid levels and capillary data were calculated assuming steady state conditions. Vertical hydrocarbon hydraulic conductivity profiles corresponding to the static fluid levels, lab hydraulic conductivity and capillary values were calculated to evaluate free product mobility. Estimate potential hydrocarbon recovery rates.
- Aerospace Company-Responsible for an extensive groundwater assessment program at a multiple-aquifer federal CERCLA site in Burbank, California. Assessment included borehole geophysical surveys, installation of approximately 30 monitor wells, approximately 40 aquifer tests, quarterly monitoring of over 100 monitor wells, water quality, water level, and well construction database management, and the preparation of approximately 12 different technical publications in support of the assessment.
- Chemical Manufacturing Company-Responsible for an extensive groundwater assessment program at a multiple-aquifer federal CERCLA site in Torrance, California. Assessment included, installation of approximately 25 monitor wells using several different construction techniques, borehole geophysical surveys, approximately 20 aquifer tests, quarterly monitoring of over 50 monitor wells. Data was used to design a containment well field.
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REFERENCES

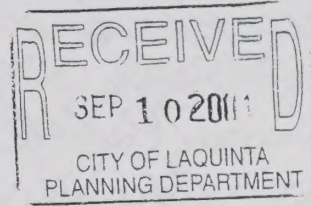
NAME	POSITION	COMPANY	PHONE NO.
David Huntley, Ph.D	Professor/Consultant	San Diego State University	619 224-6422 (h)
Father Bill Metzdorf	Executive Director	Promiseland Ranch St. Vincent de Paul Society	619 687-1315
Javid Siminou	City Engineer	City of Poway	858 679-4351
Richard Belyea	Vice President of Environmental Risk	CoAmerica Bank	714 424-3813
Steve Coolong	Senior Engineer	Navy-Southwest Division	619 532-2811
Jim Smythe	Chief Engineer	Sweetwater Authority	619 420-1413

September 9th 01 1

X

La Quinta Planners,

Regarding EIR Report July 2001



I am against the EIR Report — it is erroneous in many many ways — and vague in others. Where are Equestrian rights mentioned? Trails that have been here for over 50 years — are dismissed with a wave of the hand. Your Agricultural overlay plan is not fully defined. Perhaps that is — because you do not understand Agriculture — i.e. Ranches and farming needs;

X - 1

- Spraying, burning, fertilizing, Harvesting, and yes — even the need to create dust on occasion is needed by the farmer in order to survive — and produce food for you.

X - 2

- Roadways that are not 4 lane or 8 lane express ways are needed in rural / agricultural / Equestrian areas — to move equipment from one farm / Ranch to another safely.

X - 3

Horse Ranch and farming needs contained:-

- The right to create noise - 24 hours a day is necessary for the farmer. Many crops in order to protect their freshness, are harvested all night long.
- In our harsh climate - tractors prepare fields well operate at night - values on machinery and man.
- The same is true of horse workouts - particularly in the Summer - early AM or late evening workouts.

These items cannot be regulated in paper by people who sit in Air Conditioned offices with no experience of life in the fields or from the top of a horse.

It is also inconceivable to many of us aware of the value of the different horse properties in Southern California - that many thousands of acres have been looked - the potential for a million dollars per acre future growth.

Horses, dogs, and ranch animals in the vocal at all times

X-4

X-5

If you people had done your "homework" properly and used good common sense — you would have recognized that fact and created the true gem of the desert — keeping and developing the wonderful enchanted village of La Quinta. With it's special attributes and also recognizing Vista Santa Rosa with it's special needs and requirements. — A dream that would be unbeatable in the future — Mex needs space — it will become a rarity as time goes on. — It's peacefulness (and spirituality of this valley) soothe men's souls. Why do you give it away so cheaply eg. — Embassy Suites — La Quinta deserved better than that. I only hope it's better looking than it's art work.

X-5

I am against the plan for it's one your rule — regarding the use of land. A farmer should have the right to keep land fallow — should he choose to let it rest — without losing the right to farm. And when do you

X-6

Give the farmer the right to purchase
barn acreage and farm it, if he chooses?

Or when is the right for the farmer to
sell land for equestrian use if he wishes
to do so? And without voice limitations.

X-6

You close us with your restrictions and
Control of the our property rights - it is
not Vista Santa Rosa that ^{away} have take away
property rights - it is the great stumbling
giant of La Quinta who rules with an iron
fist as to land use. The same City
that creates high walls needing a ^{30°} grade of
water wasting grass that is to stop the sparks
do not water the grass - They drain into
the gutters and roll down the streets.

X-7

Your lack of concern for our true water
situation in this valley is a dangerous
one. WE DO LIVE IN A DESERT AREA - WHERE
PUBLIC LANDSCAPING SHOULD REFLECT THIS FACT.

X-8

^{pg 11-8}
Your Hydrology Report is way off and full of
^{pg 11-5}

holes — who did it? Were you aware
 that in 1939 — 9 to 12 inches of water came
 down in one day in September and
 that in ^{Sept} 1976 2 to 4 inches of rain fell, causing
 flooding — Imagine what that amount of
 rain does to clay soils & add to liquefaction
 the term "quicks" — and the threat of many homes
 in peril. Add to this your prediction (11-6) of
 earthquakes w/ the next 20 to 30 years. Not a
 pretty picture for builders to build homes for our
 citizens — but they do — eg. Shay Homes and
 Coral Mt developments. What ever happened to
 common sense and what's right and wrong?
 It has been tossed away by attention to
 developer pockets. Those who live out of the valley.

X-8

You in LG claim to be sensitive to Nature —
 what does the lightning of the mountains do —
 to the night animals that live there?
 I also have noticed that those heavy
 duty lights were never turned off during
 the energy crisis ??? other people had

X-9

to do w/o for those kilowatts used!

X-9

¹⁹ As to Tamarisk in this area - they should be eliminated for the ^{excessive} surface water they consume, and the salt they add to the soil. - Originally imported from China - they have outlived their use as massive wind breaks for the open lands. Other wind resistant trees can do the same purpose with less water use.

X-10

If as stated on II-11 the present resources "most valuable assets are the mountain views and open decent vistas" - why do you erect tall ^{solid} walls on tall berms to shut off - not only air movement but these same ^{valuable} assets - Many of us are against this policy - but I Q walls on w/o regard to good common sense or what the local people want!

X-11

Regarding air quality - your plan for Urban Sprinkles - Thousands and thousands more cars starting up and spewing their problems

X-12

Into ^{all} Coachella Valley Cities' ^{air} (yes we do have South winds that sweep up thru the rest of the valley.) ^{That} will clearly put the air quality at more risk. 2000-2001 has shown the deterioration of our air quality - the mountain views have been ^{more} blurred and hazy than in previous years. - Remember the stack clear out lines in previous years before the construction boom? We should learn from others gone before; Los Angeles was known to the Indians as the land of smokes" (from their campfires). Now you have a below ^{sea} level basin - in which smog from ^{many} more vehicles will gather, as it is heavier than air. South winds will then carry this to the other Cities; - for this reason also - I protest your expansion plans for this area.

X-12

What do we do with our waste products? We are already running out of space for waste from those already here. - In fact the local waste can't be

X-13

Accommodated now. Dump areas are too far and too few - so local roads and nearest areas receive the local trash. - Solve local problems - before creating a monstrous problem in this area of more trash and waste accumulation. - For this reason I am against your EIR.

X-13

Be wise intelligent leaders - plan well - Do not sell out your ethics or your citizens. Remember Voters carry a big club and will use it - if you leaders let them down by unwise choices.

The economic cycle is also turning - there out the entire world - Grenier seems to have lost his magic - at least for the time being. For how long - no one can predict. At least the date crop looks awesome this year - that is - if it doesn't rain - do you have the answer to that one?

Respectfully Submitted,
B. Mangan Smith

B. MANGAN SMITH
82-470 AVE 54
VISTA SANTA ROSA, CA.
92274.



Vista Santa Rosa Planning Committee

John Powell, Jr., Chairman

Lee Anderson, Jr.

Richard Foxx

John Gamlin

Albert Keck

Rich Meyers

Ellen Lloyd Trover

Duane Young

P. O. Box 297

Coachella, CA 92236

Y

September 5, 2001

Mr. Fred Baker
Principal Planner
City of La Quinta
78-495 Calle Tampico
La Quinta, CA 92253

**RE: CITY OF LA QUINTA COMPREHENSIVE GENERAL PLAN/DRAFT
ENVIRONMENTAL IMPACT REPORT/SCH 2000091023**

Dear Mr. Baker:

Thank you for the opportunity to comment on the referenced document. The proposed Annexation No. 12 and Sphere of Influence amendment includes Vista Santa Rosa, approximately 19-square miles within territory described more broadly by the EIR as "Thermal." Vista Santa Rosa had, until last year, been a part of the Thermal community. However, acting upon a request by some residents, Supervisor Wilson split the Thermal Community and formed a new Community Council. The Vista Santa Rosa Community Council acts in an advisory capacity to Supervisor Wilson's office on all matters affecting, or potentially affecting the community, as defined by its boundaries. It meets monthly, and has not had an opportunity to approve or reject the comments made on the attached pages. Rather, the comments are presented by individuals from the Vista Santa Rosa Community Council Planning Committee. Therefore, the comments cannot be considered the official position of the Vista Santa Rosa Community Council, but are representative of the thoughts and concerns of a few of its constituents.

The Planning Committee is comprised of individuals appointed by the Vista Santa Rosa Community Council to study and report back on land use matters affecting Vista Santa Rosa. The Planning Committee's Mission Statement, adopted by the unanimous vote of its members, is:

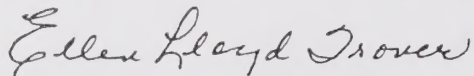
"The development of the Vista Santa Rosa area in a positive, proactive and sensitive manner that incorporates the ambiance and cultural charm of the area, preserves the

property and use rights of land owners and welcomes proposals and ideas from residents, land owners, developers and civic entities to develop high quality residential, recreational and commercial projects."

In our view, the most significant local issue pertains to the proposed "Agricultural Overlay." The EIR makes several references to this important general plan component; yet, the associated text is not available in the document for review. This makes it difficult to fully gauge potential impacts and the effectiveness of the associated mitigation measures. We believe the Agricultural Overlay is of critical importance and urge the city not to defer its inclusion in the general plan text available for public review. When our group met with Mayor Peña, Councilmember Sniff and Ms. di Iorio on August 13, the city extended an invitation for us to meet with its environmental consultant. We would like to do this as soon as possible to hear its thoughts regarding how our comments will be addressed in the Final EIR. We will contact you to arrange the meeting.

Y - 1

Sincerely,



Ellen Lloyd Trover
For the Vista Santa Rosa Planning Committee

cc: Jerry Herman
Community Development Director
City of La Quinta
P. O. Box 1504
La Quinta, CA 92254

**COMMENTS RE: CITY OF LA QUINTA COMPREHENSIVE GENERAL
PLAN/DRAFT ENVIRONMENTAL IMPACT REPORT/SCH 2000091023**

Section III-A, "Land Use Compatibility" characterizes 77% of the land area within Annexation No. 12 as "developed" (EIR III-14). The text also states that approximately 70% (3,782 acres) is currently designated for agriculture and very low density residential. The discussion should clarify whether land currently in agricultural production or other type of rural use is included within this classification. Much of the area is vacant, in agricultural production, or devoted to large parcel ranch and equestrian uses. In other words, the area is more accurately described as "rural" than developed. The opportunity to safeguard rural lifestyles as urbanization advances is a key issue for many in the area. For our purposes, "rural lifestyles" includes those uses currently allowed under the existing zoning and general plan classifications of Riverside County. Farmers should have the choice to continue with land in agricultural production, much the same as ranchers should be able to enjoy the use of their lands for horse ranching or other purposes currently allowed under the existing county ordinances.

Y - 2

The city has assigned a pre-dominant general plan classification of "LDR" (2-4 d.u./acre) with an "Agricultural Overlay" overlying much of the same territory. However, the EIR does not provide a great deal of explanation with respect to the overlay. The discussion should be expanded to include more detailed information concerning the Agricultural Overlay and how it will allow for continued agricultural, equestrian and other rural lifestyles, as both interim and permanent uses. Specific concerns exist about potential land use conflicts arising as the urban edge expands outward, and there is an interface with agricultural uses. More particulars are needed that shed light on how the policies and standards of an Agricultural Overlay would ameliorate conflicts. Problems at the interface between agricultural uses and new developments could result in practical or legal difficulties and could have quality of life impacts.

Y - 3

Section III-B, "Agricultural Resources" purports to use an Agricultural Overlay (as noted above), in order to "...preserve agricultural uses to the extent desired by landowners." The text continues, "Lands within the Agricultural Overlay will be allowed to continue cultivation as under the existing General Plan, until such time as the landowner chooses to develop." While such statements should offer comfort to those who intend to or are engaged in agricultural pursuits and/or rural lifestyles, the lack of specifics raises many questions. Rather than defer the details of the Agricultural Overlay to the future, the policies and standards should be drafted now. Many of the mitigation measures suggested by the EIR could be incorporated as standards in the Agricultural Overlay. Some of the mitigation measures appear to address regulatory matters pertaining to agricultural use of property rather than measures intended to address impacts related to agricultural resources, i.e. 3. E. & F. Detailed information regarding the overlay would be useful; including the type of agricultural land uses coupled with definitive policies and standards. Further, the overlay should anticipate potential conflicts along the urban edge (as anticipated by the EIR) and offer solutions that have a tangible relationship to underlying technical data. For example, buffer design should be a function of evaluating the contributing factors associated with

Y - 4

the impacts. Some examples are the type of agricultural activity, the proposed adjacent land use, the prevailing wind directions, noise contour modeling, pesticide drift, etc. The technical information should be used to arrive at a scientifically defensible buffer that will adequately mitigate potential impacts.

Y - 4

Section III-C, "Traffic/Circulation" contemplates a circulation network featuring a system of arterial, secondary and collector roadways overlying a grid established by section lines. The Vista Santa Rosa Community Council's "Vision Committee" has developed several preliminary "Vision Statements" for the area one of which may include large tracts of land developed as very low-density equestrian oriented communities. In some instances, the type of circulation network proposed may be over-designed to service the relatively low volumes of traffic generated by such enclaves and the cross-sections may be out of character with the design of such communities. One of the challenges of creating a cohesive, functional circulation system could be a land use pattern that juxtaposes the more traditional, higher density urban uses with rural lifestyle-type communities. Solutions will be needed that accomplish the disparate purposes of not compromising the design integrity of such areas while maintaining the integrity of the circulation system. One suggestion is that a roadway cross-section be added to its circulation element that is compatible with a rural lifestyle community, yet achieves the required Levels of Service.

Y - 5

Section III-D, "Soils & Geology" indicates that much, if not all of the Vista Santa Rosa area features engineering and geologic properties that make it susceptible to geologic hazards such as wind erosion, ground failure, and expansive/collapsible soils. Table I-4, "Land Use Buildout Statistical Summary" projects a total of 12,225 units at buildout for Annexation No. 12. Using the average household size of 2.75 persons per household (as purported by the EIR), this equates to a population of almost 34,000 persons at buildout. Obviously, this is considerably more people exposed to the potential risk of geologic hazards than the current EIR estimated population of 639 residents. Of particular concern are liquefaction and in particular, subsidence risks. Subsidence risks are noteworthy because they are associated with pumping of groundwater, as the EIR suggests. At the current time, the Coachella Valley Water District groundwater management plan for the eastern Coachella Valley is being drafted. The EIR should consider the data and findings being used by CVWD in its study, and incorporate mitigation measures consistent with CVWD, if suitable. Also, the CVWD groundwater management plan envisions a long period of stabilization of the overdraft and replenishment of the basin to historic levels. It would be interesting to see a timeline that compares the anticipated absorption of units within Annexation No. 12 to the implementation of the groundwater management plan. It seems like there would be a correlation between the exposure of persons to potential geologic risk and the timing/success probability of the CVWD plan.

Y - 6

Section III-F, "Water Resources/Quality" comments that approximately 40% of domestic water consumed is reintroduced into the groundwater table through percolation. However, other sections of the EIR note that the Thermal area features lacustrine deposits associated with ancient Lake Cahuilla, which contain relatively significant amounts of clay. Clay layers can act as barriers to groundwater recharge, or what the EIR refers to as "aquitards." This is evidenced by the extensive tile drain system in the area, which illustrates how percolation in some locations is in fact, very poor. It should be noted that the pilot recharge facility located near Avenue 62 and

Y - 7

Madison Street to which the EIR refers lies upstream of what geologists commonly believe was the shoreline of ancient Lake Cahuilla. Therefore, the percolation characteristics of the surface and subsurface soils may be very different. The EIR should consider local factors in the area and make an assessment concerning how much domestic water can actually be expected to be recaptured in the groundwater basin.

The characteristically slow percolation rates in the area should also cause the EIR to revisit the premise that detention/retention basins will play any meaningful role in efforts to filter runoff and stabilize/recharge the groundwater basin.

Y - 7

A beefed up discussion of the CVWD groundwater management plan, including its data sources, findings and conclusions, if available, could be incorporated into the EIR. This would help ensure that there is synonymous thinking regarding the existing conditions and would be useful in gauging potential impacts and appropriate mitigation measures.

Section III-G, "Biological Resources", seems to infer that the city is planning to opt into the Multiple Species Habitat Conservation Plan now being prepared by the Coachella Valley Association of Governments and its members (of which La Quinta is one). However, whether this decision has been made or not is unclear. The text should clarify whether if the city does not opt into the MSHCP, the mitigation measures as proposed are deemed adequate to mitigate any potential impacts.

Y - 8

Section III-H, "Cultural Resources." The Torres-Martinez tribe, though not subject to the general plan, is considered to be a part of the Vista Santa Rosa area. Therefore, we would urge the city to actively solicit the input of the tribal council concerning cultural resources, and for that matter, on all issues pertaining to general planning and land use.

Y - 9

Section III-K, "Visual Impacts." As attempts to define a vision for the area encompassed by Annexation No. 12 and much of the SOI emerges, preservation of scenic vistas to the Santa Rosa and San Jacinto Mountains is considered a very important matter. Other mitigation measures that could be considered on a project-by-project basis include appropriate use of landscape materials to allow views, wall heights and materials, grading, etc.

Y - 10

Section III-L, "Public Services and Facilities." The provision of public facilities and services to annexed areas is an area of significant concern. Reliance is placed upon agencies outside the city, and over which the city has little or no control. However, some of the mitigation measures assign the responsibility for mitigation on these same agencies. Services that the city *does* provide will require funding commitments that once in place, will constitute an annual fiscal drain. Therefore, the viability of city-provided public services is seen as inexorably linked to the analysis contained in **"Section III-M, Socio-Economic Resources."**

Y - 11

The figures for Annexation No. 12 indicate a deficit of about \$5.4 million at buildout. This analysis is based on achieving an average density of 3 units per acre over the annexation area. It is assumed that the city anticipates offsetting the deficit with general fund surpluses resulting from the development and/or annexation of other areas featuring land uses possessing positive fiscal

Y - 12

attributes to the city, i.e. commercial/industrial development and resort/hospitality. The EIR text should correlate the timing of Annexation No. 12 with annexation in other areas in order for the reader to better understand the projected cash flow on an annualized basis. This way, an assessment can be made of the potential impacts of timing shifts, or the underachievement of projected revenue sources in any particular year. Also, it would be interesting to know what the consequences would be of the density/intensity yield of Annexation No. 12 being underachieved, e.g. if the area were to develop at 2 units per acre, rather than 3, with a corresponding reduction in other non-residential uses as well.

IRIS CAPITAL GROUP

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Z

August 27, 2001

Mr. Fred Baker
City of La Quinta
78-495 Calle Tampico
La Quinta, CA 92253

**Re: City of La Quinta July 2001
Draft Comprehensive General Plan
Draft Environmental Impact Report
SCH No.: 2000091023
Draft Master Environmental Assessment**

Dear Mr. Baker,

This Draft EIR is not an objective assessment of the environmental impacts. It is biased and therefore does not satisfy the requirements of CEQA.

Z - 1

The above referenced Draft Environmental Impact Report (EIR) for the Proposed Comprehensive General Plan ("The Plan") does not adequately address the following issues which should be resolved and corrected before the EIR is adequate per CEQA and any General Plan is updated. Many of these issues were raised before regarding your Notice of Preparation of an Environmental Impact Report for the City of La Quinta General plan up date notice to the General Plan, but were ignored. Again, I raise them, and refer you again to the letter by Ellen Trevor dated May 21,2001.

Z - 2

Per state law you are required to adequately address the issues that have significant impact and not with a biased view, but with an objective view which does not seem to be occurring.

The issues that need to be addressed so that the EIR would actually be adequate and legal per CEQA guidelines are as follows:

1. The Agricultural Overlay is unclear. The Plan does not define in detail what types of properties are incorporated into the Agricultural Overlay yet refers to it constantly throughout the report. In fact there is no clearly written and defined agricultural overlay per the City of La Quinta. Therefore, the EIR is invalid until this is clearly defined.

Z - 3

2. The Socio-Economic impact of the proposed development on the equestrian industry and uses within the Annexation Area No. 12 (AA) and the proposed Sphere of Influence (SOI) have not been addressed even though this issue has been raised numerous times to the city of La Quinta in letter and verbal form, in City Council meetings, and in letters regarding the Proposed Notice of Preparation of the EIR. The Draft EIR still ignores the likely damage to the horse industry that currently brings in about \$70,000,000 annually into the local region, and is projected to grow to \$120,000,000 in the next few years. Development of the annexation and SOI area with 2-4 houses per acre with no equestrian overlay and protections, wide roads, and resort, commercial and industrial development, with only 100 foot buffer zones, will ultimately decimate this burgeoning industry by destroying stabling and training facilities, shrink the agricultural pasture lands making livestock and horses too expensive to keep, and decimate the local alfalfa industry. The Proposed La Quinta General Plan Alternative, will negatively impact the equestrian community and severely reduce local employment and tourism due to the equestrian industry, particularly for the Cities of Indio and Coachella.

Z - 4

3. La Quinta has provided no equestrian overlay or provision for equestrian use as a mitigation measure which would be easy to incorporate into the Plan, even though a significant portion of the entire area proposed to be annexed and put into the Sphere of Influence(SOI) is equestrian oriented. This must be addressed and thoroughly mitigated through wider buffer areas, reduced development density, smaller roadways particularly through the "Vista Santa Rosa " maintaining two lane rural roads and imposing 35 mph speed limits along with soft curbs and side of road areas for safe equestrian passage. The Vista Santa Rosa is bounded by Avenues 52 and 66, Harrison and Monroe.

Z- 5

4. Per the County Regional plan, equestrian trails were to be incorporated throughout the area. They have been virtually left out in certain areas such as along Avenue 60, changed to golf cart paths or obscured in the Proposed General Plan and not addressed in the EIR in traffic issues, cultural resources, or socio-economic impacts. e. The EIR does not address this issue and the Plan does not accommodate the trails that should be shown and were provided for in the Specific Plan for PGA West and in the Regional Plan.

Z - 6

5. Wildlife corridors and movement to open space will be destroyed. The trail system would of allowed wildlife movement throughout the area. A valid, safe and complete equestrian trail system would allow for the corridor/movement of wildlife throughout the area and to open space. With the lack of an adequate trail system through this area, La Quinta will have destroyed any ability of the native wildlife to have survived. The trails should go throughout the area, and roads made smaller down to two lanes with soft edges instead of curbs to provide and protect wildlife movement and equestrian usage.

Z - 7

6. The proposed development density, road system, and traffic load will destroy the ability to utilize the roadways safely for agricultural or equestrian uses. The proposed traffic increase to 1,250,000 traffic trips per day will make unsafe usage of the roads for livestock, horses, or farm equipment. Per CEQA this must be thoroughly addressed and mitigated which has not been done.

Z - 8

7. Per CEQA, traffic plans must accommodate the movement of agricultural equipment when the annexation is of agricultural land. This has not been done. Furthermore, the traffic plan would not accommodate horse trailers. The roundabout at Jefferson and 52nd right near the Polo club is impossible for a large trailer to navigate safely. Z - 9
8. The proposed roadway system and traffic plan would destroy the scenic resources of the area. One of the most beautiful roadways in the entire area is palm tree-lined Avenue 60, between Jackson and Van Buren. Yet it is planned to be major arterial. The impact of the roadway system destroying scenic resources must be addressed and mitigated. The roadway system is too large and aggressive throughout the Vista Santa Rosa area. It should be reduced to two lanes, soft curbs, no lights, and 35 MPH speed limits. Z - 10
9. The claim that "This land use designation of up to two units per acre provides a transition between agricultural lands and more intense urban uses and promotes a progression of compatible land uses." This is invalid as a transition as the density will provide significant problems for neighboring agricultural/ranch uses. Z - 11
10. Mitigation of buffer areas of 100 feet are completely inadequate. It should be 500 feet and the zoning density decreased significantly. Z - 12
11. The No Project Alternative would be a better choice. It would preserve the current agricultural land use designations and preserve the ability to farm and allow the growth of the equestrian industry. Z - 13
12. The traffic impact at build-out which would generate approx. 1,200,150 daily vehicle trips per day in the area, would have a significant impact. It would not operate within acceptable levels in the annexation and SOI area. 15 roadway segments would exceed capacity. This would cause a significant impact on agricultural and equestrian usage. To state otherwise is biased. Z - 14
13. Water Resources will be significantly impacted per CVWD. The EIR does not adequately mitigate or address the depletion of the groundwater and the depletion of local wells of the residents in annexation and SOI areas. Again the EIR is biased. Per The EIR states that CVWD has demonstrated that groundwater recharge at this location south of Lake Cahuilla since 1996 has been feasible. This is not completely true and misleading. Z - 15
14. The claim that 40% of domestic water is re-absorbed into the groundwater table and not lost is not true in the lower eastern Coachella basin. Moreover, any recharge water is not as clean as the original groundwater. The impact of this has not been adequately addressed. There will be a need to build out new treatment plants—who pays for this and what is the socio-economic impact of this on the area residents? Who will mitigate the residents for their wells drying up as the overdraft on the water table is furthered by the proposed development. Z - 16
15. The EIR claims La Quinta will protect domestic water supplies. How? The socio-economic impact on the residents of switching from septic and wells to CVWD has not been addressed. Again, who pays for this and the sewer lines? and what is the impact on the residents. Z - 17
16. There is no real provision for Open Space or biological resource survival. The EIR states "the general Plan annexation and LOI land use designations all propose to maintain a low density development pattern and preserve sensitive biological Z - 18

- areas as undevelopable open space.” Identifying golf courses as open space is not per government code. A golf course is not a valid resource area for biological survival as golf courses have a high usage of pesticides and chemical fertilizers. This must be addressed. Implementation is not expected to have a significant adverse impact on biological resources.”—This is not true! No where in the midst of the area La Quinta claims to be preserving is there any really useful open space except the edge of some rocky knolls that are really impossible to utilize except for rock climbers and bighorn sheep. The lack of wildlife corridors and greenbelts without walls, that allow access to real open space areas, will significantly impact the biological resources of the area. Z - 18
17. The potential increase in pesticides and chemical fertilizers due to the increase golf courses and median and roadway strips has not been considered on the groundwater and wildlife. Z - 19
18. The destruction of prime farmlands has not been fully addressed or mitigated. Over 30% of all the dates in North America are grown in the Vista Santa Rosa area of the plan alone. In the entire annexation and planning area, the number could be virtually 80%. This issue has not been fully addressed or sufficiently mitigated. Z - 20
19. The destruction of the scenic resources of the area has not been fully addressed or mitigated. The views of the Santa Rosa mountains is one of the most special parts of the area, loved by all who live in the area or visit. There is nothing in the plan that truly protects that, such as the elimination of walls and berms, and the plan for view corridors. Z - 21
20. Air pollution increase in the basin is falsely represented as it will be significant due to the increased motor trips. Z - 22
21. More open space is defined as golf courses. Golf courses may or may not be public or visible so it is not real “open space”. And is a misuse and misleading term.-I-22. Z - 23
22. II-3 Agricultural Resources: Never mentions equestrian uses, pasture and alfalfa, which is inadequate. Z - 24
23. The planned additional 66,811 residential units at 75% build-out, is outrageous for the area, and will have a more than significant impact on all aspects of the area. That is a virtual another Los Angeles. This will destroy the local economy as the reason people come from LA is to get away from the density. The negative impact to the local economy of the proposed development must be considered. Z - 25
24. On page III-10, the EIR states “the proposed land use densities and assignment do not appear to pose any significant land use incompatibilities with existing or planned land uses in adjacent jurisdictions.” This is completely untrue and biased. All the true and cumulative impacts must be addressed. Z - 26
25. Open space Land uses—III-12 No real open space is actually being planned. Golf courses are not Open Space. The park area actually planned in the annexation and sphere of influence area is only 20 acres, in an area comprising over 12,000 acres. This is completely inadequate for the public and potential residents. Z - 27
26. The Summary of Impacts is invalid and biased. On page III-13, the EIR states that “impacts within the City of La Quinta and on surrounding lands resulting Z - 28

from adopting implementation of the proposed General Plan are not expected to be significant” This is completely false. How can an additional 1,250,000 daily traffic trips and 66,000 new homes immediately adjacent not be significant? This is a biased EIR. The impact on agricultural alone will change the financial dynamics of Indio and Coachella and Riverside County. The ultimate elimination of equestrian ranches will impact the horse industry and dynamics of that vital industry in the desert to say nothing of the removal of year round activities being changed to resort and second homes thus diminishing year round activity for many businesses.

Z - 28

27. The EIR states that the approval of the SOI amendment would not result in any significant adverse environmental impacts to lands within the SOI or its vicinity, per their EIR. This not true, and again biased. It would diminish the local residents self-destiny and would encourage more development, as La Quinta is pro-development. It will diminish the equestrian interest in the area and thus reduce the value of the local properties, as the plan does not accommodate equestrian interests.

Z - 29

Sincerely,

Tracey Darroll

Resident and Land Owner

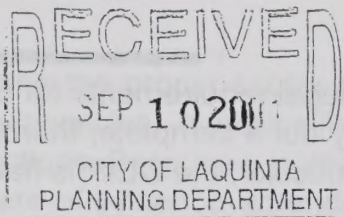
83-581 Avenue 60

Thermal (Vista Santa Rosa), CA 92274



CITY OF INDIO

AA



Development Services Department
September 10, 2001

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Police
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Engineering/Building
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Fax: 760.342-6556

City Yard
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Senior Center
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Mr. Fred Baker, Principal Planner
City of La Quinta
78-495 Calle Tampico
La Quinta, CA 92253

Subject: Environmental Review - La Quinta General Plan EIR

Dear Mr. Baker:

Pursuant to your July 13, 2001, transmittal, we have reviewed the Draft Environmental Impact Report (DEIR) for the City of La Quinta General Plan. While your transmittal indicated that the last day to file comments was August 26 (Sunday) the law requires a minimum of 45 days for the review of the DEIR. Therefore, the end of the minimum required comment period was August 27, 2001, the 45th day from your date of transmittal. However, your office notified us that they have extended the comment period to September 10, 2001. Therefore, we respectfully offer the following comments submitted within the noticed comment period.

The environmental analysis of the General Plan includes approximately 53,498 acres encompassing the City of La Quinta's corporate boundaries (20,254 acres); a proposed annexation area (5,420 acres); a sphere-of-influence amendment (8,205 acres); and lands outside the sphere (19,619 acres). The City of Indio is particularly concerned about the latter of these areas under consideration – the 19,619 acres located outside the sphere of Influence of the City of La Quinta - and it is to that area in particular that we address our comments and concerns. Because of the proposed project's potential effect on the City of Indio, we have carefully reviewed the DEIR to ascertain whether it addresses all of the potential impacts, as established by the California Environmental Quality Act (CEQA) and the State CEQA guidelines.



Our conclusion - the DEIR fails to meet the minimum legal requirements for both procedural and substantive aspects necessary to carry out a complete, thorough and objective analysis in accordance with CEQA. In particular, the DEIR is flawed and deficient in the areas of:

AA - 1

- Proper notice to affected and adjoining governmental jurisdictions.

- General Plan, zoning and land use descriptions of Indio Ranchos Country Estates and Polo Resorts properties immediately adjacent to your area of interest and north of Avenues 50 and 52 in the City of Indio are not identified or are inadequately described. These are areas of particular concern to the City of Indio, its residents and investors and must be addressed in the DEIR.

AA - 2

- Traffic impacts upon the City of Indio including impacts upon such major north/south roads as Jefferson, Madison, Monroe, Jackson, Calhoun and Van Buren which provide the most direct access to both Highway 111 and the I-10 freeway and all of the inter-related intersections thereto resulting from the potential of 80,000 new dwelling units rather than 66,000 dwelling units identified in the DEIR.

AA - 3

- Traffic impacts upon the City of Indio including impacts upon such major east/west roads as Avenue 52, Avenue 50, Avenue 49, Avenue 48, Highway 111, Miles Avenue, Fred Waring Drive and all of the inter-related intersections thereto resulting from the potential of 80,000 new dwelling units rather than 66,000 dwelling units identified in the DEIR.

AA - 4

- Cumulative impacts upon all areas of sensitivity to thresholds including mitigation measures, public improvements and other financial offsets for enhanced infrastructure to affected public agencies necessary to properly mitigate the significant impacts.

AA - 5

- Consideration of reasonable municipal service agency alternatives to the project including leaving the area within the City of Coachella Sphere of Influence, placing the area into the City of Indio's Sphere of Influence, creation of a Vista Santa Rosa Municipal Advisory Council under the jurisdiction of the County of Riverside or the incorporation of a city of Vista Santa Rosa.

AA - 6

- In other instances, the DEIR contains summary and conclusionary statements that are not supported by any information, documentation or analytical data.

AA - 7

In determining the proper scope of an EIR, it is necessary to consult with the appropriate agencies, municipalities, and public who will be impacted by the proposed actions. Because a portion of the area being considered for annexation and a sphere-of-influence amendment currently lies in the city of Coachella's sphere-of-influence and the fact that both cities of Indio and Coachella would bear impacts from buildout of the proposed General Plan, the absence of a "Notice of Intent to Prepare an EIR" to the City of Indio has resulted in a void of information relative to impacts upon the City of Indio. Traffic, noise, land use, and water resource impacts upon the City of Indio were not fully analyzed or disclosed in the DEIR. It should be noted that the City of Indio was not sent a Notice of Preparation (NOP) for the DEIR. It is unclear to us whether such notice was overlooked with the City of Coachella - and if it was, there may be additional shortcomings in this DEIR.

AA - 7

Although the document contains a substantial amount of information, the DEIR is inadequate since it fails to fully analyze the General Plan's impact on several environmental categories including mineral resources, hazards and hazardous materials, and parks and recreation. These categories were identified in the Initial Study as less than significant and potentially significant. This is very questionable since the buildout will add about 66,811 new dwelling units (see comment below regarding the potential maximum buildout). All of the environmental categories identified above that have been excluded in the DEIR are required to be analyzed in EIRs for general plans.

AA - 8

The DEIR fails to include an accurate project description. In particular, the DEIR ignores the fact that the area being considered for annexation and sphere-of-influence amendment is currently in the City of Coachella's sphere-of-influence. This oversight is significant for all parties involved (citizens and property owners in and surrounding areas, investors/developers, affected public agencies) in the decision making process regarding this very important land resource opportunity. All members of the public are owed a reasonable description and comparison analysis of all options in analyzing your proposal. In fact, one of the actions necessary to achieve the project's end result is a LAFCO Sphere of Influence Amendment by the City of Coachella deleting a portion of their SOL.

AA - 9

The DEIR fails to provide any thresholds of significance as a baseline for determining whether the impact for each of the issue areas is significant.

AA - 10

The analysis in the DEIR underestimates the impacts of buildout of the proposed General Plan and the proposed annexation and sphere-of-influence amendment areas on the adjacent cities of Indio and Coachella. This is especially apparent in the impact analysis for public services and utilities. The DEIR uses 2.75 persons per household to determine the impacts. This number is considerably lower than the household size figures used by the California Department of Finance (3.263 persons per household), and the Southern California Association of Governments (3.24 persons per household - 2005 and 3.14 persons per household - 2020). The DEIR's low household size figure is used throughout the analysis, significantly underestimating the impacts of the buildout of the General Plan on all public services and utilities by 20 percent – that is as much as 13,362 additional households and dwelling units.

AA – 11

Alternative analysis in the DEIR is inadequate because it does not comply with CEQA's requirement to provide alternatives that substantially lessen or avoid environmental damage. Instead, the DEIR presents a "more intense development scenario" which does not lessen or avoid environmental damage and has impacts greater than General Plan buildout.

AA – 12

Besides containing substantial errors in forecasting impacts, the DEIR also lacks consistent application of the cumulative impact analysis, especially as it pertains to the proposed annexation and sphere-of-influence amendment. Time and time again, the cumulative impact analysis for an environmental category consists of a brief, superficial discussion that is factually lacking.

AA – 13

In sum, the DEIR discounts or entirely ignores many significant, adverse environmental impacts associated with buildout of the General Plan and the proposed annexation and sphere-of-influence amendment areas. An EIR must be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to take necessary and appropriate actions. The DEIR's analysis of the project's impacts fails this test, being seriously misleading and inaccurate.

AA – 14

The following is a list of some of the deficiencies in the DEIR. We conclude that the DEIR is inadequate in its present form and that the DEIR requires additional information and analysis of such substantial nature that it cannot be completely corrected by simply responding to the comments which follow. The additional information, needed for the Riverside County LAFCO to make an informed and intelligent decision in accordance with CEQA Guidelines, is so extensive as to justify additional peer review by recirculating the EIR as a draft for public review. Prior to

AA – 15

recirculating the EIR, the issues raised in these comments need to be fully addressed. Without the benefit of peer review, the information presented to LAFCO will contain many of the flaws identified below.

AA - 15

Detailed Comments

Page I-4 Project Description

The project description does not disclose that a substantial portion of the area being considered for the proposed annexation and sphere-of-influence amendment is currently in the city of Coachella. Rather, the DEIR addresses the City, its SOI and land outside the SOI. While the existing City area encompasses 31 square miles; existing SOI area includes another 2.7 square miles; the area outside the SOI encompasses an additional 49 square miles. Clearly the preponderance of the area reported in the DEIR is located outside the City of La Quinta Sphere of Influence and yet the level of information provided for this area is described at best, as being "broad." Perhaps a better term might be to describe the DEIR's description and analysis of this area outside the SOI is "vague."

AA - 16

Page I-9 Existing Land Uses

There is a discrepancy between the number of acres and dwelling units disclosed in the second and third paragraphs, and those shown on Tables I-1 and I-2. Normally, this would be a simple mathematical error that could be easily corrected. However, it may be indicative of a common and critical error in this document, i.e. making incorrect mathematical forecasts for critical issues.

AA - 17

Page I-10

The second paragraph refers to the properties within the jurisdiction of the City of Indio. It is a general description that offers an inaccurate depiction of what exists and planned for areas critically close and adjacent to the proposed Sphere of Influence amendment area. In particular, existing land uses located in the two square mile area bounded by Avenue 52 on the south, Madison and Jackson Streets on the west and east, and Avenue 50 on the north are oriented around major equestrian facilities including the Empire Polo Grounds, the El Dorado Polo Grounds and the Horses in the Sun (HITS) equestrian facilities. These land use activities are core equestrian facilities that have resulted in the establishment of very significant equestrian investments for the area, including new estate sized lots and housing with equestrian permitted accessory uses. In addition, the area immediately

AA - 18

north of Avenue 50 is also zoned and used for equestrian oriented single family residential properties.

The Indio General Plan and zoning for these areas (Country Estates Indio Ranchos zoning and Indio Ranchos Polo Estates Specific Plan) recognize existing land uses and projects future land use policy to be of an equestrian nature. To ignore their presence in and around this portion of the Vista Santa Rosa community would be a disservice to both existing and future landowners of the area; not to mention the land use ramifications of non-equestrian properties locating nearby equestrian oriented activities such as these. It would seem "good planning" to build upon the equestrian orientation that is being pursued by both the City of Indio and the Vista Santa Rose community.

AA - 18

Page I-12

On Table I-1, two columns of information are reported: "City of La Quinta" and "Sphere/Planning Area." The latter column groups together the land area currently in the City of La Quinta's Sphere of Influence and the land area currently in the City of Coachella sphere of influence. The table needs to be enlarged to accommodate a split of the latter category into two distinct categories for analysis to better enable the reader the opportunity of comprehending and assessing the issue of deleting the 19,619 acres from the Coachella SOI and placing that area or a portion thereof into the La Quinta SOI.

AA - 19

Page I-13

On Table I-2, what is the land use buildout for the City of La Quinta, the proposed annexation area, the sphere-of-influence amendment area, and the remaining planning area? In the Office category as well as the Commercial and Industrial subtotals, there are many typographical errors which makes it difficult to distinguish the correct buildout numbers for Office, Commercial and Industrial land uses. What is the correct buildout for Office? What are the correct Commercial subtotal? What are the correct Industrial land uses? This could be an easily corrected simple error. However, it is indicative of a pattern of errors in this document that includes providing incorrect information for critical issues.

AA - 20

Pages I-19 and I-20

On Tables I-4 and I-5, what are the existing land uses (not the existing General Plan designations) for the proposed annexation area, sphere-of-influences amendment

AA - 21

area, and the remaining planning area? How many acres of the proposed annexation, sphere-of-influence, and remaining planning area are currently being used for agricultural? Classifying their existing land uses as either "very low density or low density" is misleading and incorrect.

AA - 21

Pages I-20 and I-21

The discussion regarding residential land uses is also misleading and incorrect. What are the existing residential land uses? How many dwelling units and residential acres are currently in the city of La Quinta, the proposed annexation area, the sphere-of-influence amendment area, and the remaining planning area? What information and methodology have been used to derive the assumption of "75 percent of the maximum densities permitted"? How many acres of "residential development" are currently being farmed or used for agricultural?

AA - 22

Page I-22 and 23

There is no mention that a portion of the area within the proposed annexation and sphere-of-influence amendment is currently within the sphere-of-influence for the city of Coachella. How many acres of the proposed annexation and the sphere-of-influence amendment areas are in Coachella's existing sphere-of-influence? How many acres of Coachella's existing sphere-of-influence are currently used for agricultural? What is the average household size for the proposed annexation and the sphere-of-influence amendment areas according to the 2000 Census? What information and methodology have been used to derive the household size of 2.75 persons per household? This is lower than the figure used by the California Department of Finance and SCAG.

AA - 23

Page I-25

Information provided in the first and second paragraphs regarding the number of acres designated for Very Low Density Residential (7,089 vs. 6,280) and Low Density Residential (22,705 vs. 11,335) is not consistent with the numbers shown on Table I-1. Why is there a discrepancy? How many acres are going to be designated as Very Low Density and Low Density Residential?

AA - 24

Page I-27

Impacts on water resources are one of the many critical components in the DEIR where impacts have been vastly underestimated. If the population is

AA - 25

underestimated, then water usage is underestimated. How was the low household size of 2.75 persons per household derived when the California Department of Finance and SCAG have projected household size to be 3.2 and above? What are the assumptions and methodologies used to come up 2.75 household figure? How is it determined that only 75 percent of the residential lands would have maximum densities permitted? How was the population figure of 207,970 derived? According to Table I-2, at buildout, the General Plan will result in 78,952 dwelling units. Using the low household size of 2.75 persons per household, the population generated is 217,118 persons, not 207,970 persons as disclosed in the DEIR. Normally, this would be a simple mathematical error that could be easily corrected. However, it may be indicative of a common, and critical error in this document, that includes making incorrect mathematical forecasts for key issues.

AA - 25

Page II-1

What are the existing land uses (not the existing General Plan designations) for the City of La Quinta, the proposed annexation area, sphere-of-influence amendment area, and planning area? How many dwelling units and what type of dwelling units (single family vs. multi family, seasonal, low income housing) in La Quinta, the proposed annexation area, sphere-of-influence amendment area and remaining portion of the planning area? How many square feet of commercial and industrial uses are in La Quinta, the proposed annexation area, sphere-of-influence amendment area, and remainder of the planning area? How many acres of parks and open space exist? How many acres and square feet of public/quasi-public facilities currently exist? How are many acres are currently in agricultural production? Why was there no mention of the fact that a substantial portion of the area of the proposed annexation and sphere-of-influence areas are currently in the city of Coachella's sphere-of-influence?

AA - 26

Page II-2 Existing Land Uses

Why is there such a large discrepancy between the information provided in the discussion of the existing land uses and the information provided on Table I-1?

AA - 27

Page II-2 Surrounding Land Uses

The information provided in the DEIR is inadequate regarding surrounding land uses in Indio and Coachella. Where are Indio and Coachella's residential, commercial, and industrial areas in relationship to the proposed General Plan, annexation area, and sphere-of-influence amendment area? Where are the

AA - 28

potential land use conflicts?

Page II-3

The DEIR downplays the fact that approximately 40 percent of the existing area (19,938 acres) in the General Plan which is currently used for agricultural purposes will be converted to urban development. What are the potential land use conflicts between proposed residential developments and existing agricultural operations? What about potential conflicts with surrounding equestrian properties to the north in the City of Indio? The close proximity to the Polo Grounds and the Desert HITS facilities?

AA – 29

Page II-6

The majority of the planning area is located in a high liquefaction hazard area. This needs to be identified in the existing setting as well as identified as an issue of future analysis and mitigation.

AA – 30

Page II-13

Domestic Water

No mention is made of the serious groundwater overdraft situation in the Coachella Valley or that the amount of water which is being pumped in from Colorado River to recharge the areas is being reduced. There is also no discussion of the subsidence caused by the groundwater overdraft situation. There is no information provided regarding how much growth the Coachella Valley can support in the future and whether the development being proposed by the General Plan can be facilitated and by what means or costs to other existing development policies.

AA – 31

Wastewater Treatment

No information is given as to the current capacity of wastewater treatment facilities that will be serving the planning area and whether they can support the additional development from the proposed General Plan at buildout; or a phasing plan for implementation.

AA – 32

Solid Waste

No information is provided as to the capacity of the landfills that will be servicing the planning area and whether the landfills can accommodate projected development.

AA – 33

Page III-2

The DEIR does not provide any information regarding existing land uses within the proposed General Plan area. How many dwelling units and type of dwelling units (single family vs. multi family, seasonal, low-income housing, equestrian oriented) in the City of La Quinta, the proposed annexation area, sphere-of-influence amendment area, the adjoining areas in the City of Indio and the remaining portion of the planning area? What is the comparative assessment between existing residential, current land use policy and what is being proposed? How many square feet of commercial and industrial uses are in La Quinta, the proposed annexation area, sphere-of-influence amendment area, and the remainder of the planning area? What is the difference between existing commercial/industrial land uses and what is proposed? How many acres exist or are proposed for public parks and recreation areas? How will General Plan buildout impact public parks and recreation areas? How many acres and square feet of public/quasi-public facilities now exist, and how many are proposed? How many acres are currently in agricultural? How many agricultural acres will be lost to urban development as proposed by the General Plan?

AA – 34

Page III-3

How was it established that only 75 percent of the residential lands would have maximum densities permitted? What are the methodology and information used to substantiate the 75 percent assumption? How did the analyst derive a 22 percent lot coverage assumption for buildout of commercial use? What are the methodology and information used to substantiate the commercial lands? How did the analyst derive a 34 percent lot coverage assumption for buildout of industrial uses? What are the methodology and information used to substantiate the industrial lands assumption? How do these assumptions differ from what is currently happening in the Coachella Valley?

AA – 35

Page III-4

Exhibit III-1 does not distinguish between Agricultural and Very Low Density residential land uses. According to the DEIR, 19,938 acres currently are designated Agricultural. There is a significant difference between the two land uses, and this difference needs to be shown. Also, there is no indication that the proposed annexation and sphere-of-influence amendment areas currently are in the city of Coachella's sphere-of-influence. In addition, there is no indication of what the existing land uses are for the adjacent jurisdictions affected by the proposed

AA – 36

General Plan. Exhibit III-1 needs to be corrected to show the difference between the Agricultural and Very Low Residential land uses, Coachella's existing sphere-of-influence, and existing land uses for adjacent jurisdictions (cities of Indio and Coachella).

AA - 36

Page III-5

Why are there inconsistencies between Table III-1 (Current General Plan - Land Use Buildout Statistical Summary) and Tables I-1 and I-2? Table III-1 states that there are 19,938 acres of Agriculture (1 du/10 acres), out of which 16,132 acres are designated for urban development. Why are there no existing dwelling units listed for these urban areas? Also, there lacks mention in either Tables I-1 or I-2 of agricultural land, when Table III clearly states that 16,132 agricultural acres are set aside for urban development. Thus, the sub-totals for each of the categories on Table III-1 are in conflict with those in Tables I-1 and I-2.

AA - 37

Page III-10, fourth paragraph

The DEIR does not address land use impacts on adjacent jurisdictions, which contain rural residential, agricultural, and private recreational areas. The higher residential densities and assignments proposed by the General Plan would be incompatible with adjacent jurisdictions' land uses and could create significant impacts.

AA - 38

Page III-13

What methodology and approach have been utilized to assess land use impacts resulting from buildout of the proposed General Plan? What threshold of significance was used to evaluate land use impacts?

AA - 39

Summary of Impacts

No information or analysis is provided regarding land use impacts on adjacent jurisdictions. The majority of the proposed annexation and sphere-of-influence amendment areas currently are in agricultural use. The proposed General Plan would designate these areas for residential development with no transitional land to buffer the existing agricultural operations. This would cause significant land use impact.

AA - 40

Page III-14

How many acres within the proposed annexation area currently are used and designated as either Agricultural or Very Low Density Residential?

AA – 41

Page III-15

The city of Coachella's current sphere-of-influence should be designated on Exhibit III-3.

AA – 42

Page III-17

No information is provided in the DEIR identifying land uses in jurisdictions adjacent to the proposed annexation area. The majority of the adjacent land uses are agricultural. The proposed General Plan would designate areas currently used for agriculture to urban development. This could result in significant land use incompatibilities.

AA – 43

Page III-18

In the proposed sphere-of-influence amendment area, the DEIR fails to specify the number of acres currently used for agricultural, nor does it identify land uses in jurisdictions adjacent to the proposed amendment area. How many acres in the proposed sphere-of-influence area support agriculture? The proposed General Plan would change land currently designated for agriculture to urban use. This would result in significant land use incompatibilities with existing and adjacent land. Again, the DEIR fails to mention that the proposed sphere-of-influence amendment area currently is in the city of Coachella's sphere-of-influence.

AA – 44

Page III-20

The majority of the proposed sphere-of-influence area and adjacent land uses currently support agricultural operations. The proposed General Plan would designate an area currently used for agriculture to urban development. This would create significant land use incompatibilities with existing adjacent land uses.

AA – 45

Page III-22

The DEIR states that the County Agricultural Resources Map shows a combined total of 28,657 acres of Prime Farmland or Farmland of Statewide Importance exist within the planning area. This conflicts with the 19,938 total agricultural acres presented on Table III-3. Why is there a discrepancy between Table III-3 and the discussion Section of the DEIR? How many acres of productive agricultural land currently are in the planning area?

AA - 46

Page III-23

Williamson Act Contracts

The DEIR fails to identify parcels currently under Williamson Act contracts. What are the proposed land uses according to the General Plan?

AA - 47

Page III-24

What were the methodology and approach taken to assess agricultural impacts resulting from buildout of the proposed General Plan? What was the threshold of significance for evaluating the impacts on agricultural lands? The DEIR should utilize the LESA methodology recommended by State Department of Resources.

AA - 48

Agricultural Land Use Impacts

In Table III-9, the DEIR states that a total of 19,938 acres are in agricultural production and recommends 17,615 acres be designated as low-density residential with an agricultural overlay. What will the remaining 2,323 acres of agricultural lands be designated? How many acres of State Prime Farmland or Farmland of Statewide Important would be designated for residential land uses? How many agricultural acres under the Williamson Act contracts would be designated for non-agricultural uses?

AA - 49

The DEIR fails to acknowledge that buildout of the proposed General Plan would convert prime Farmland and Farmland of Statewide Importance to non-agricultural uses; therefore, a significant impact will result.

AA - 50

Page III-35

What are the existing average daily traffic (ADT) volumes for the proposed annexation, sphere-of-influence, and the remaining planning areas? No information is provided in the DEIR. Also, no information is provided as to the existing Level of Service (LOS) and ADT for the areas that will be affected in the adjacent jurisdictions (cities of Indio and Coachella). Since the adjacent jurisdictions will be affected by General Plan traffic, existing traffic information is needed.

AA – 51

Page III-36

Where are the routes for public transit services? What is the existing rider ship for public transit service? How many trains provide passenger service? Where is the train station in Coachella Valley, and how far is it from the proposed planning area?

AA – 52

Page III-37

Are there bicycle and pedestrian facilities in La Quinta and the proposed General Plan area? If so, where are they located? Are there any plans for bicycle and pedestrian facilities? Are provisions made for electric golf carts?

AA – 53

Page III-38

What methodology and approach have been utilized to assess traffic and circulation impacts resulting from General Plan buildout? What are the thresholds of significance for determining whether traffic impacts are significant?

AA – 54

Page III-39

Level-of-Service on Roadway Segments

How many segments have a volume-to-capacity (V/C) ratio between 0.91 and 0.99? Where are those segments located? Are there any segments with a V/C ratio between 0.91 and 0.99 located in the adjacent jurisdictions?

AA – 55

Page III-40

What assumptions have been used for the traffic model? What assumptions were made regarding access to network roadways and actual impacts to capacity?

AA – 56

Page III-43

Intersection Analysis

Which intersections located in adjacent jurisdictions will be impacted by traffic associated with General Plan buildout? Which intersections in Table III-14 are located in adjacent jurisdictions? The most direct lines of access from the proposed Sphere of Influence Amendment area and the I-10 freeway or Highway 111 are via Jefferson, Madison (along an uncompleted segment to the north), Monroe, Jackson,

AA – 57

Calhoun and Van Buren. It is the City of Indio's contention that the addition of upwards of 80,000 new dwelling units will have significant impacts upon these and connecting roadways/intersections and will require mitigation if better alternatives are not pursued.

Summary of Roadway Impacts

What are the ADT volumes projected to result from buildout of the Recommended Land Use alternative, and how will volumes affect circulation systems in adjacent jurisdictions? Your traffic analysis must identify the roadway segments in the adjacent jurisdictions that will likely operate with volumes exceeding their design capacities? And mitigation of such impacts is required.

AA – 58

Roadway Classifications

What are the existing roadway classifications and do they differ from those proposed? How do the proposed roadway classifications correspond to existing roadway classifications of adjacent jurisdictions?

AA – 59

Page III-58

Which mitigation measures address traffic impacts on adjacent jurisdictions?

AA – 60

Page III-72

Project Impacts

What methodology and approach were used to assess soils and geological impacts resulting from the proposed General Plan? What thresholds of significance were used to determine whether impact on soils and geological are significant?

AA – 61

Page III-74

What are the wind erosion and blowsand impacts resulting from the construction activities associated with General Plan implementation?

AA – 62

Page III-75

What assumptions have been used to determine that no substantial amount of development will occur within the proposed annexation and sphere-of-influence areas in the near future?

AA – 63

Page III-84

What methodology and approach were used to assess impacts on storm water run-off and flooding? What thresholds of significance were used to determine whether the proposed project would have significant impacts on hydrology? What are the storm water and flooding impacts resulting from the buildout of the proposed General Plan on adjacent jurisdictions (the Cities of Indio and Coachella)? What mitigation measures will be taken to reduce storm water and flooding impacts on the adjacent jurisdictions?

AA – 64

Page III-91

What methodology and approach were used to assess impacts on groundwater resources in the Coachella Valley? What are the thresholds of significance used to determine whether the proposed project would have a significant impact on groundwater resources? What is the basis for the assumption of a 23 percent increase in commercial lands and a 43 percent increase for industrial lands stated in the DEIR?

AA – 65

The DEIR assumes a low household size which underestimates water consumption impacts. This is especially apparent in the impact analysis for public services and utilities. The DEIR uses 2.75 persons per household to determine impact. This number is considerably lower than the household size figures used by the California Department of Finance (3.263 persons per household) and the Southern California Association of Governments (3.24 persons per household in 2005 and 3.14 persons per household in 2020). The DEIR should be revised to reflect these updated household size assumptions to analyze water consumption and impact on groundwater resources resulting from the buildout of the proposed General Plan.

AA – 66

There is no impact analysis for the increase in water consumption of commercial and industrial land uses resulting from buildout.

AA - 67

Page III-111

What methodology and approach were used to assess impact on biological resources resulting from the buildout of the proposed General Plan? What thresholds of significance establish criteria to determine whether the proposed project would have significant impacts on biological resources? Would the urban development proposed by the General Plan affect biological resources in adjacent jurisdictions?

AA - 68

Page III-120

Where historic resources exist within the planning area? Which historic sites are on the State and National Registers? Are there any local historic resources?

AA - 69

Page III-121

What methodology and approach were employed to assess impact on historic resources resulting from General Plan buildout? What are the thresholds of significance used to determine whether the proposed project would have significant impacts on historic resources? Which historic resource would be affected?

AA - 70

Page III-132

What methodology and approach were used to assess air quality impacts resulting from the buildout? What thresholds of significance have been used to determine whether the proposed project would have significant air quality impacts?

AA - 71

Page III-138

What assumptions and information were used to determine the average trip length?

AA - 72

Page III-139

What are the air quality impacts on adjacent jurisdictions? Are there any sensitive land uses within the adjacent jurisdictions which will be affected by carbon monoxide hot spots?

AA - 73

Page III-141

What air quality impacts on adjacent jurisdictions will result from buildout within the proposed annexation and sphere-of-influence amendments areas?

AA - 74

Page III-149

Which computerized noise model was used and what were the assumptions? What are the thresholds of significance used to determine whether the buildout would have a significant noise impact? Where are the sensitive receptors? Are there any noise-sensitive land uses in the adjacent jurisdictions which will be affected by development?

AA - 75

Page III-151

What was the basis for the assumptions regarding train trips and aircraft operations? What impact will the future train trips and aircraft operations have on proposed urban development? What assumptions were made regarding noise impacts generated from commercial and industrial development? How were noise impacts assessed? Where are sensitive receptors in relationship to planned commercial and industrial development?

AA - 76

Page III-155

What are the noise impacts on sensitive uses in adjacent jurisdictions resulting from buildout within the proposed annexation and sphere-of-influence areas?

AA - 77

Page III-160

What methodology and approach were utilized to assess visual impacts? What thresholds of significance were used to determine whether the General Plan would have significant impacts on visual resources? Are there any view corridors that will be affected by proposed development? Will scenic views from surrounding areas be affected by the proposed urban development?

AA - 78

Page III-162

The urban development proposed within the annexation and sphere-of-influence areas are not consistent with the rural, agricultural and open space land uses of the existing General Plan designations. The DEIR needs to be revised to reflect this.

AA - 79

Also, the proposed urban development designations in the annexation and sphere-of-influence areas will be in direct contrast with the adjacent scenic rural open spaces and will impact visual resources and view corridors.

AA - 79

Page III-166

According to Table I-2, the number of dwelling units resulting from buildout is 78,952 units, not the 66,811 units reported here. The school enrollment analysis should be revised. The breakdown between single family and multi-family is different than the one used in the air quality analysis (Table III-24). What is the proposed capacity of the Mountain Vista Elementary School and how will it ease the elementary student overcrowding which will result from the buildout of the proposed General Plan? The average persons per household size is increasing. How will this affect the methodology and approach (student generation rates) taken to assess school enrollment impacts resulting from the buildout? What thresholds of significance are used to determine whether buildout would have significant impacts on school facilities? What are the specific student enrollment impacts on the Desert Sands Unified School District? On the Coachella Valley Unified School District?

AA - 80

Page III-170

The DEIR uses a low household size figure and therefore underestimates impact on library facilities. The DEIR uses 2.75 persons per household to determine the impacts. This number is considerably lower than the household size figures used by the California Department of Finance (3.263 persons per household) and the Southern California Association of Governments (3.24 persons per household in 2005 and 3.14 persons per household in 2020). The DEIR should be revised to reflect a current household size figure in analyzing public services. Also, what methodology and approach were used to evaluate impact on library services and facilities? What are the thresholds of significance used to determine whether the project would have significant impacts on libraries?

AA - 81

Page III-172

The DEIR should be revised to reflect a current household size figure to analyze impact on police protection services. Also, what methodology and approach are used to assess impacts on police protection services resulting from the buildout of the proposed General Plan? What are the thresholds of significance used to determine whether there would be significant impact on police protection services?

AA - 82

Page III-174

What methodology and approach were used to assess impact on fire protection services? What are the thresholds of significance used to determine whether there were significant impacts? Which fire agency currently serves the amendment and sphere-of-influence areas? Are fire stations planned for the proposed General Plan area? If so, where?

AA - 83

Page III-175

What methodology and approach were used to assess impacts on health care facilities and services? What thresholds of significance were used to determine whether there would be significant impacts? Are any public health facilities planned to meet the increased population?

AA - 84

Page III-177

Where are existing solid waste facilities in relation to the proposed annexation and sphere-of-influence amendment areas, and what are the landfill capacities and closure dates? How much solid waste is currently generated? How much solid waste will be generated in the future? What methodology and approach were used to assess solid waste impacts? What thresholds of significance were used to determine whether there would be significant impacts? It is unrealistic to assume that the buildout pursuant to the proposed General Plan (19,137,651 square feet of commercial and 28,835,849 square feet of industrial) will not result in any hazardous waste generation.

AA - 85

Page III-181

What is the service area for the existing sewage treatment plant? How much wastewater will be generated within the project area? What methodology and approach were used to assess wastewater impacts? What thresholds of significance were used to determine whether significant impacts would result?

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Page III-183

The DEIR uses a low household size to estimate water usage and therefore underestimates the impacts on domestic water service. (See prior discussion). The DEIR should be revised to reflect an updated average household size to analyze impacts on domestic water services. What methodology and approach were used

AA - 87

to assess domestic water service impacts? What thresholds of significance were used to determine whether significant impacts result? What impacts occur due to development in the proposed annexation and sphere-of-influence amendment areas?

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Page III-186

What methodology and approach were utilized to assess electrical service impacts? What thresholds of significance were used to determine whether significant impacts will result?

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Page III-189

What methodology and approach are taken to assess natural gas service impacts resulting from the buildout of the proposed General Plan? What are the thresholds of significance used to determine whether there were significant impacts resulting from the buildout of the Proposed General Plan on natural gas services? What are the impacts from the proposed annexation and sphere-of-influence amendment? What impact will this have on the adjacent jurisdictions?

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Page III-190

What methodology and approach were used to assess cable service impacts? What thresholds of significance were used to determine whether significant impacts will result?

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Page III-198

The DEIR uses a low household size assumption to assess public service impacts (see previous discussion) and therefore underestimates impact. The DEIR should be revised to reflect an updated household size assumption to analyze impacts on public services.

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Page IV-1

Is the loss of 26,312 acres of Prime Farmland considered an unavoidable significant impact?

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Page V-1

The "More Intense" Alternative should not be considered in the DEIR since this alternative does not comply with CEQA regulations by reducing or eliminating environmental impacts. With the "More Intense" Alternative eliminated from consideration, the DEIR does not present an adequate range of reasonable alternatives to meet CEQA requirements.

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Page V-13

What impacts to existing agricultural resources result from a "No Project" Alternative? What are the impacts of the "No Project" Alternative on land use within the adjacent jurisdictions?

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Page V-14

Under CEQA regulations, Alternative I: More Intense Development should not be considered as an alternative in the DEIR because it does not reduce or eliminate any significant environmental impacts. Under Alternative II: Less Intensive Development Scenario, what are the impacts to existing agricultural resources? How many acres of Prime Farmland would be converted to urban land uses? How does the Less Intense Alternative impact land use in adjacent jurisdictions? How would the land use impacts associated with the project differ from No Project and Less Intense Development Alternatives? How would land use impacts on adjacent jurisdictions differ between the No Project and Less Intense Development alternatives?

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Page V-16

What traffic impacts in adjacent jurisdictions (circulation and intersections) result from the No Project Alternative?

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Page V-17

Under Alternative II: Less Intensive Development Scenario (Table V-4), the traffic impacts are greater than the proposed project. How does the Less Intense Alternative impact circulation and intersections in adjacent jurisdictions? How would traffic impacts differ from No Project and Less Intense Development Alternatives? How would traffic and circulation impacts on adjacent jurisdictions differ among the alternatives?

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Page V-18

The DEIR does not provide adequate information to compare the relative impacts with respect to soils and geology. How would project differ from the No Project and Less Intense Development Alternatives?

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Page V-19

The DEIR does not provide adequate information to compare the relative impacts on hydrological systems among the alternatives. How do the No Project and Less Intense Development Alternatives affect flooding in adjacent jurisdictions?

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Page V-20

The DEIR does not provide the quantitative information necessary to analyze potential water quality and resources impacts for the alternatives. What assumptions were used for the population projections? Will groundwater overdraft or water quality impacts result from the No Project and Less Intense Development Alternatives? How do impacts of the project compare to the No Project and Less Intense Development Alternatives both within the project area and regionally? ?

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Page V-22

The DEIR does not provide sufficient information to enable comparison of the potential biological resource impacts among the alternatives. Would the No Project and Less Intense Development Alternatives impact biological resources in adjacent jurisdictions? How do impacts associated with the project compare to the No Project and Less Intense Development Alternatives both locally and regionally?

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Page V-23

The DEIR provides no information to enable comparison of potential cultural resources impacts among the alternatives. Will the No Project and Less Intense Development Alternatives impact cultural resources in the adjacent jurisdictions? How do the air quality impacts of the project compare to impact from No Project and Less Intense Development Alternatives both locally and regionally?

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Page V-23

How might the No Project and Less Intense Development Alternatives affect air quality in the adjacent jurisdictions? How do project air quality compare to impacts from the No Project and Less Intense Development Alternatives both locally and regionally?

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Page V-25

How might traffic noise associated with the No Project and Less Intense Development Alternatives impact adjacent jurisdictions? How do noise impacts compare between the alternatives?

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Page V-27

What are the regional visual resource impacts associated with the No Project and Less Intense Development Alternatives? How do visual impacts compare between the alternatives?

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Page V-29

The DEIR underestimates the public services and utilities impacts because the analysis utilizes a low average household size of 2.75 persons per household. As discussed above, the California Department of Finance and SCAG project a larger average household size, at least 3.2 and above. The public services impacts of the alternatives should be re-analyzed using this updated household size. How would the public service impacts differ from the No Project and Less Intense Development Alternatives both locally and regionally?

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Page VII-1

Prime Farmland is considered a non-renewable environmental resource. The DEIR should state that Prime Farmland will be permanently lost due to implementation of the proposed General Plan.

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Page VIII-1

How do the growth-inducing impacts of the proposed General Plan impact adjacent jurisdictions' agricultural resources?

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Page VIII-2

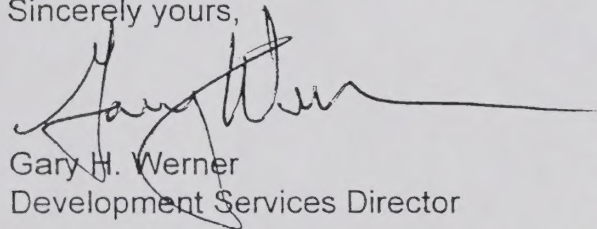
The DEIR underestimates the cumulative impacts by using a figure of 2.75 persons per household (see discussion above). The DEIR lacks consistent application of the cumulative impact analysis, especially as it pertains to the proposed annexation and sphere-of-influence amendment. Buildout of the proposed General Plan, together with development within the proposed annexation and sphere-of-influence areas, would have a significant cumulative impact on the adjacent jurisdictions.

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In conclusion, the environmental analysis contained in the DEIR exhibits significant flaws. The analysis substantially underestimates the type and severity of significant impacts associated with the buildout of the proposed General Plan and within the annexation, and sphere-of-influence amendment areas. Because of inconsistencies in the document and the underestimation of impacts, the DEIR requires substantial reworking to comply with CEQA and also requires recirculation. In particular, a thorough analysis of impacts on the cities of Indio and Coachella associated with the proposed annexation and the sphere-of-influence amendment are critical.

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Sincerely yours,



Gary H. Werner
Development Services Director

cc: City Manager

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